

Marc Wolstenholme
5 Shetland Close
Coventry, England CV5 7LS
Telephone: 044 7827964404
Email: marc@mvwolf-fiction.co.uk
Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,

Plaintiff,

vs.

RIOT GAMES, INC.,

Defendant

CASE NO. 2:25-CV-00053-FMO-BFM

HON. FERNANDO M. OLGUIN

PLAINTIFF'S EXHIBIT W- DETAILED
BREAKDOWN AND ANALYSIS OF
EPISODE 5: SUPPORTING EVIDENCE FOR
COPYRIGHT INFRINGEMENT CASE

MARCH 02, 2025

Dated this: March 02, 2025

M. WOLSTENHOLME

[MARC WOLSTENHOLME]

**Detailed Breakdown and Analysis of episode 5, season 1 of Arcane: Supporting Evidence
for Copyright Infringement Case**

1

PLAINTIFF'S DETAILED BREAKDOWN AND ANALYSIS OF GASLIGHTING OF EPISODE 5:
SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

EXHIBITS

Episode 5 of Arcane, officially called Everybody Wants to Be My Enemy, has been called Caitlyn Kiramman's episode. It starts with Caitlyn investigating a lead in the undercity, showing her skills as an independent and determined enforcer. This episode delves deeper into Caitlyn's character, highlighting her resourcefulness and moral compass as she navigates the corruption within Piltover and her growing connection to Vi.

One of the most significant aspects of this episode is Caitlyn and Vi's partnership, which begins to take shape as they leave Stillwater prison together. Caitlyn, frustrated with Piltover's systemic failures, takes matters into her own hands by freeing Vi, who she believes can help her uncover the truth about Silco's operations. This decision marks a turning point for Caitlyn, as she steps out of her privileged Piltover upbringing and into the harsh realities of the undercity.

Visually, this episode continues Arcane's signature animation, with vibrant neon-lit scenes contrasting against the gritty, decaying environment of Zaun. The tension between Piltover and the undercity is palpable, and Caitlyn's presence in this world emphasizes the stark differences between the two societies.

The title, Everybody Wants to Be My Enemy, references Imagine Dragons' song Enemy, which plays during an iconic montage featuring Jinx. This sequence showcases Jinx's descent into madness, haunted by her past and struggling with her fractured psyche. The episode

3

PLAINTIFF'S DETAILED BREAKDOWN AND ANALYSIS OF GASLIGHTING OF EPISODE 5:

SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

1 juxtaposes Caitlyn's journey with Jinx's, highlighting their differing paths and the choices that
2 shape them.

3 By the end of the episode, Caitlyn has proven herself to be more than just a
4 privileged enforcer, she is brave, determined, and willing to challenge the status quo. Her
5 growing bond with Vi adds emotional depth to the story, setting the stage for further
6 developments in their relationship and the overarching conflict between Piltover and Zaun.
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

EXHIBIT A- Amanda Overton Wrote Episode 5.

Amanda Overton has confirmed in several interviews, and in Bridging the Rift, the making of Arcane, that she wrote episode 5, from Christian Linke’s “Show Bible” which nobody else was allowed to see. Amanda is also credited as writing this episode on IMDb and many other sources.

Amanda states that “I did have one of the writers teach me how to shoot a gun, like a sniper gun, right before I was going to write Caitlyn’s episode last year.”

Last year, way late into the stages of the fake timelines, and Caitlyn’s episode, 5, still wasn’t written. Spoiler but later I’ll show you that Arcane: Bridging the Rift was filmed in the latter half of 2021 alongside the actual making of Arcane. But much had to be cut because of my IP claim made on the 24th of November 2021. This shows that Mid to late 2020, episode 5 of the show wasn’t written.

Moreover, In the Episode 4 break down the Plaintiff has evidence that on the map created after June 2020, Stillwater Hold wasn’t on the map, and Stillwater is in episode 4 and 5, thus both had to have been written after June 2020.

Amanda Overton gave Caitlyn her surname, Kiramman. Before the show, Caitlyn didn’t have an official last name in League of Legends lore, because it was a “Fight Porn” game and Riot didn’t even start to put effort into the dodgy narratives before 2018. Overton revealed in interviews and social media that she created the name Kiramman to fit Piltover’s aristocratic culture and Caitlyn’s background as a noble.

5

PLAINTIFF’S DETAILED BREAKDOWN AND ANALYSIS OF GASLIGHTING OF EPISODE 5:

SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

1 This was part of Arcane's broader effort to expand and deepen Caitlyn's character,
2 making her more than just a skilled sheriff. Her full name, Caitlyn Kiramman, now carries
3 weight, reflecting her privileged upbringing, family expectations, and the contrast between her
4 status and her growing connection to the undercity through Vi.
5

6 7 **Legal Conclusion for Exhibit A – Amanda Overton & Episode 5**

8 **Development Timeline**

9 **Key Allegations**

10 Amanda Overton's Statements Contradict Riot's Claimed Timeline

11 Amanda Overton explicitly states that she learned how to shoot a sniper rifle
12 "right before" writing Caitlyn's episode.
13

14 Caitlyn's episode is Episode 5, meaning this episode had not been written at that
15 time.
16

17 This contradicts Riot's claims that Arcane's scripts were locked by the end of
18 2019.

19 If the scripts were finalized in 2019, as Riot's legal representatives have stated,
20 then why was Episode 5 still being written in mid-to-late 2020?

21 Bridging the Rift & Arcane's Production Timeline Were Altered Due to Plaintiff's
22 IP Claim
23

1 Plaintiff alleges that Bridging the Rift, the behind-the-scenes documentary, was
2 filmed in late 2021, alongside active production of Arcane.

3 If true, this means the final production of Arcane was happening after Riot gained
4 access to the Bloodborg manuscript.
5

6 Furthermore, Plaintiff alleges that parts of Bridging the Rift were altered or
7 omitted due to his November 24, 2021, IP claim.

8 Still Water Hold Did Not Exist on Maps Created After June 2020

9 The Arcane map was developed after June 2020 (per Charles Lee's Instagram
10 post).
11

12 Still Water Hold was not on this map, yet it appears in Episode 4 & 5.

13 This proves that Episode 5 was written after June 2020, further contradicting
14 Riot's claims that Arcane's story was finalized in 2019.
15
16
17
18
19
20
21
22
23
24

1 This would help prove whether Bloodborg was used as a reference and whether
2 Riot intentionally misrepresented the development timeline.

3
4
5 *Spoliation of Evidence*

6 If Bridging the Rift was altered to remove incriminating content, this could
7 constitute spoliation of evidence.

8 The plaintiff may request forensic recovery of any deleted or altered footage from
9 Bridging the Rift to determine what was removed.

10
11
12 **Conclusion**

13 Exhibit A provides strong evidence that Riot's timeline for Arcane's development
14 was fabricated, and that Episode 5 was written after Riot had access to the Bloodborg
15 manuscript. This creates a plausible basis for discovery requests into Riot's internal documents,
16 script drafts, and communications related to Episode 5.

EXHIBIT B- SHOOTING IN THE SNOWY FORESTS.

This exhibit presents a comparative analysis of the "Shooting in the Snowy Forests" scene from Arcane and its alleged similarities to Bloodborg: The Harvest by Marc Wolstenholme. The analysis highlights shared thematic elements, character development, and narrative structures.

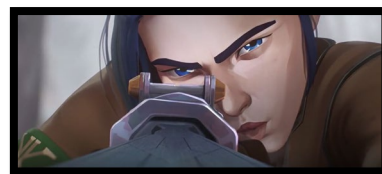
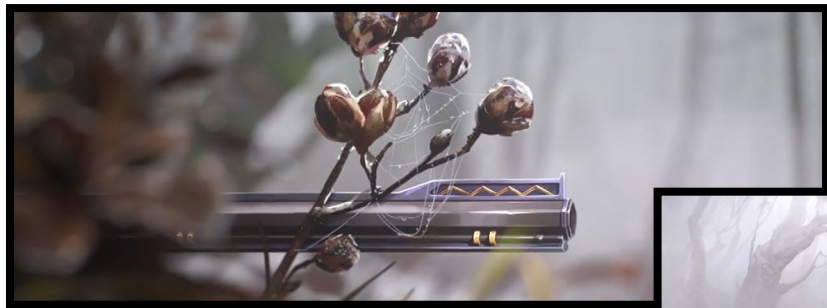
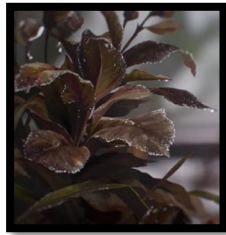
The episode begins with a story flashback of Caitlyn shooting in the snowy forests of somewhere other than Piltover as we see a dense woodland or forest. Caitlyn is shooting targets with Grayson, the Sheriff of the Enforcers. Caitlyn was a marksman in the LOL games long before Arcane. The Plaintiff alleges and will show that she was added to Arcane because she fit the characteristics of an "IP" which Riot could force into Josh's POV from Bloodborg. Cardboard Caitlyn with the circus hat, has now been retconned to bring her backstory aligned to Josh's of Bloodborg.

Caitlyn Kiramman displays exceptional marksmanship, easily hitting her target while the others struggle. This moment serves as an early indicator of her sharpshooting skills and her independent, competitive nature. The scene also subtly highlights Caitlyn's discomfort with the rigid expectations of Piltover's aristocracy. While she excels at the noble pastime, her real interests lie in justice and protecting people, rather than upholding the traditions of the elite.

In the opening scene we are shown:

1. Winter bear trees, snowy and misty
2. Frosty brown leaves

3. The barrel of her Rifle
4. Caitlyn laying in the prone position in the snow, ready to shoot.
5. Caitlyn hitting all of her targets with great speed.
6. Startled birds flying west, north -west toward the Piltovan Council
Building in the far ground.
7. Grayson taking the lead in the shooting competition.
8. Caitlyn steadying her breathing and taking the winning shot.
9. Grayson pulled her last shot to let young Caitlyn win, keeping her on her
toes and motivated, but rewarding her by letting her win.
10. It is implied and is likely, that Grayson and the sportsmanship of her, were
key motivators in Caitlyn's development into a great marksman.



12
PLAINTIFF'S DETAILED BREAKDOWN AND ANALYSIS OF GASLIGHTING OF EPISODE 5:
SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

1 Caitlyn Kiramman had an established but relatively simple backstory in League of
2 Legends lore. Over the years, her lore has evolved, and Arcane expanded on her character
3 significantly. Before Arcane, Caitlyn's sharp intellect and marksmanship were apparent from a
4 young age. In older versions of her lore, Caitlyn's parents were kidnapped by an unknown
5 criminal mastermind during a Progress Day festival. Using her intelligence and sharpshooting
6 skills, she tracked them down and rescued them. This event solidified her passion for justice and
7 crime-solving. Arcane removed this storyline, replacing it with a new dynamic family where her
8 parents are alive but overprotective and politically powerful, until her mother dies in season 2.
9

10
11 In Caitlyn's lore prior to Arcane, she is depicted as spending considerable time in
12 the forests outside Piltover, honing her tracking and shooting skills. According to her official
13 biography on the League of Legends Universe page, Caitlyn was "equally adept at mingling with
14 the moneyed citizens of the City of Progress or tracking a deer through the mud of the forest."
15 This suggests that she practiced her marksmanship in wooded areas, possibly engaging in
16 activities like hunting.
17

18 **Allegation:** It is alleged that, having read the Bloodborg manuscript, Arcane's
19 developers, more specifically, Linke and Yee saw the opportunity to fit many of LOL's
20 cardboard characters with generic overview stories with "Treasured gateways" into the narratives
21 of Bloodborg. It is alleged that having read, Josh's POV, the "Writers" of Arcane "swiped" the
22 ideas of placing a sharpshooter suffering with PTSD from trauma into the show, and indeed the
23 whole central theme of trauma in Arcane is taken from Bloodborg.
24

Thus, it is alleged that it is not a conscience that Bloodborg features a POV of a sharpshooter suffering with PTSD from trauma and so does Arcane having 170 characters to select from to find fits to “Gripe” into the narrative.

Josh’s story flashbacks and dialogue exposition in Bloodborg,

Whilst there are some differences, Josh is a sharpshooter, having developed his skills whilst growing up in the rural 4th quarter (highlands), and this is strikingly similar to the scene depicted in Arcane. The main allegation here is bastardizing LOL game characters into Bloodborg’s narratives. Thus, yes Caitlyn had some of these features before, and that is precisely why she was picked to fit into this narrative. It’s a case of fitting a small square into a bigger squares hole and padding it out.

Josh’s quotes from Bloodborg,

1, “*My father and I use to shoot deer up in the mountains of the 4th quarter, that’s where I grew up.*”

2, “*I’ve eaten meat, my family ran a deer range in the 4th quarter, my dad used to tuck away a bit of venison for the family now and again.*”

3, “*The Concoction (Rescogita) is more available in the 4th quarter because the mountains are harder to search.*”

1 4, “I’m pretty fast, you have to be to chase down the deer in the 4th, and I climb
2 very well, I’ve climbed most of the hardest routes up in the highlands.”

3 5, “The only place I ever belonged was in the forest of the 4th, by my fathers’
4 side.”

5 6, “Just like you are when you hunt deer in the forest at home. Soft feet, slow
6 movements, controlled breathing, and sharp eyes. Night Josh.”

7 8 9 **Key Allegations and Analysis**

10 **Character Parallels**

11 Sharpshooter Protagonists: Both Caitlyn (Arcane) and Josh (Bloodborg) are
12 exceptionally skilled marksmen with training backgrounds rooted in forested, snowy
13 environments.

14 Mentorship & Guidance: Grayson (Arcane) and Josh’s father (Bloodborg) play
15 similar roles in shaping their protégés into skilled shooters.

16 Themes of Trauma: Josh’s PTSD and Caitlyn’s struggle with Piltover’s societal
17 expectations both contribute to their independent, justice-driven arcs, but in season 2, Caitlyn
18 exhibits the same PTSD symptoms of trauma as Josh in Bloodborg, with many of the written
19 trauma in Bloodborg matching the visuals of Arcane’s scenes. Moreover, the juxtaposition of
20 shooting targets or deer compared to shooting a human is featured in both works highlighting the
21 innate horror and repulsion of pulling the trigger with a person in one’s sight.

Narrative Parallels

Setting: Both scenes occur in a snowy forest with mist and brown frosty leaves.

Character Development: Both stories use shooting as a mechanism for growth and motivation, whether through Grayson's coaching or Josh's father's influence.

Storytelling Techniques: Both narratives employ story flashbacks to illustrate formative moments in the characters' lives.

Symbolism: In both stories, shooting serves as a metaphor for focus, discipline, and personal growth, then later as a consuming moralistic decision and fork in the road.

Conclusion

The similarities between Arcane's "Shooting in the Snowy Forests" scene and Bloodborg: The Harvest suggest potential inspiration or adaptation of key thematic, narrative and character elements. While Caitlyn was already an established character in League of Legends, her backstory was expanded in Arcane in ways that closely align with the narrative foundation of Josh from Bloodborg.

The core allegation is that Arcane's writers intentionally incorporated elements from Bloodborg to enrich Caitlyn's backstory, adapting pre-existing League of Legends characters to fit themes central to Bloodborg's narrative. The thematic and narrative structures of

1 both works, particularly the depiction of a sharpshooter shaped by their upbringing in a snowy
2 wilderness, show notable parallels.

3 Further analysis and comparative breakdowns of additional scenes strengthen the
4 argument that Arcane borrowed material from Bloodborg, reinforcing the copyright infringement
5 claim.
6

Exhibit C- Piltover Council Building & Map Inconsistencies

During Caitlyn's Shooting competition scene, we are shown two images of the Piltover Council Building in the misty far ground. The Piltover Council Building is a pivotal setting in the Arcane series. This building is featured in Arcane for trials, meetings and debates. The building was destroyed by a Hextech-powered missile, Fishbones, which Jinx shot. The building is first featured during the opening bridge battle scene in episode 1 of Arcane season 1.

Image 1 from Episode 1.

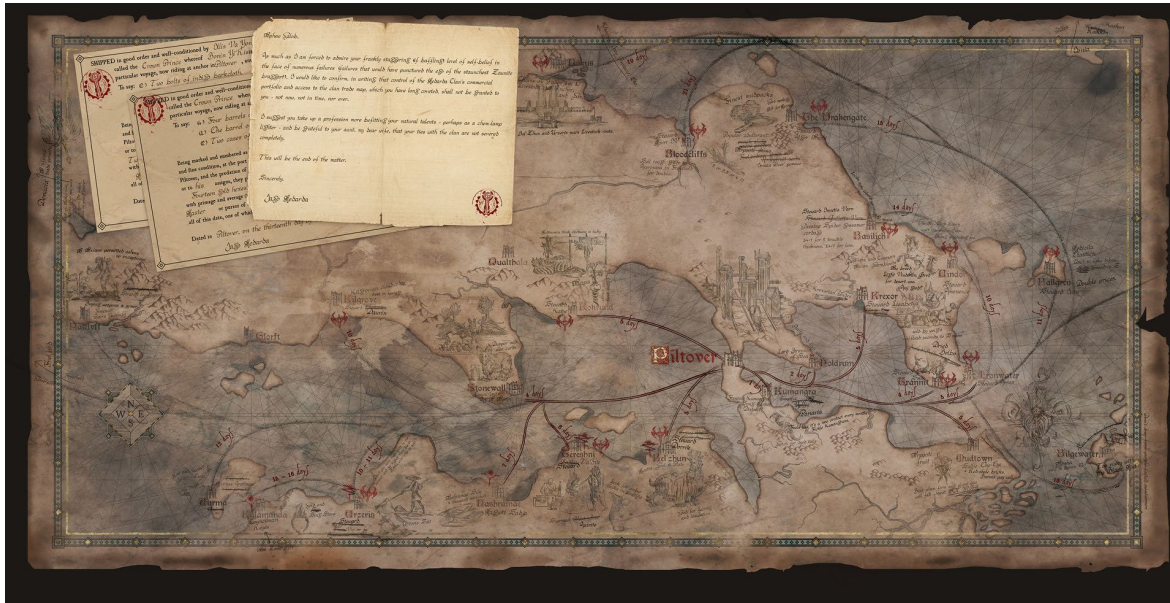


Image 2 & 3 from Episode 5 shooting competition.



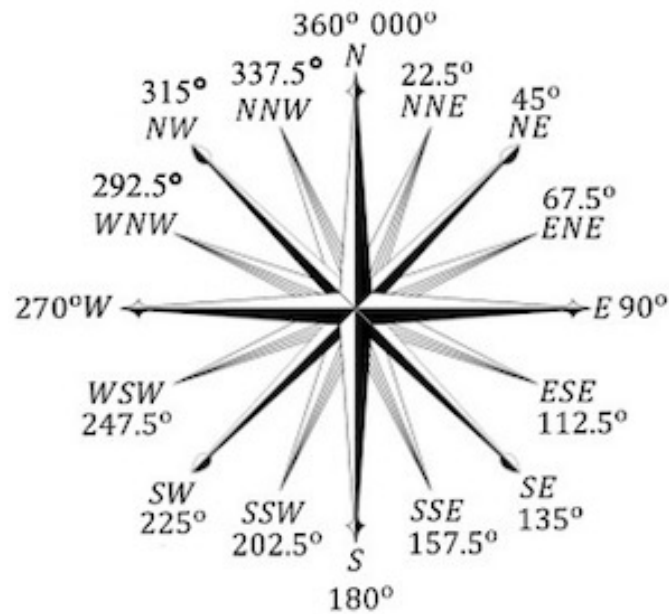
In this 2016 map we can see that the Piltover Council Building is facing south.

Images 4 & 5



During celebrations directly after the shooting, we see Grayson and young Caitlyn
at a different location. This location is around south- southeast.

Image 6 & 7



From these images we can deduce:

1, Zaun is located across the Bridge in almost a linear direction from the Piltover Council Building. Thus south.

2, The Piltover Council Building is at a bearing of around 292.5° WNW, from the location of the shooting competition.

3, Thus, the shooting competition is taking place at a bearing of around 112.5° ESE from the Piltover Council Building.

4, post shooting celebrations took place at a bearing of around 157.5°

Given the assumed distance and size of the of the Piltover Council Building, the location of the shooting point is likely to be under water on this map. See image 8.

Image 8



1 However, In the PLAINTIFF’S EXHIBIT H - DETAILED BREAKDOWN AND
2 ANALYSIS OF EPISODE 4: SUPPORTING EVIDENCE FOR COPYRIGHT
3 INFRINGEMENT CASE document, it has been shown that Charles Lee, working on Visual
4 development on Arcane between June 2020 - November 2022, created an updated map of
5 Piltover and Zaun during Arcane’s “pre-production” in the Summer of 2020, long after Riot’s
6 solicitors claim everything had been worked out.
7

8 Charles Lee shared the Arcane map of Piltover and Zaun on Instagram on
9 December 17, 2024.

10 https://www.instagram.com/clconceptart/p/C_oGJS3S8o1/?hl=en-gb

11 Charles Lee shared on Instagram:

12 *"The Arcane map of Piltover and Zaun. Around 3.5 years into Arcane pre-*
13 *development, we needed a map of Arcane world both for the art team in LA and the writer's*
14 *room. This was the 8th revised version."*
15

16 It should be noted; Still Water Hold is not on the map. This shows that changes
17 were made to the map and story to include Still Water Hold, after Charles Lee joined the project
18 and after they made this map.
19

20 Charles Lee

21 Charles Lee’s LinkedIn CV states that he worked on Visual development on
22 Arcane between June 2020 - November 2022 (2 years 6 months). If his Instagram post is correct,
23 he joined pre-production after June 2020 and then developed the map. If the 3.5 years of pre-
24

production is accurate, this would place the start of pre-production back to around the start of 2017, the period of the failed projects and pilots.

Thus, this tells us:

1. Still Water Hold was not in the scripts till after June 2020
2. The scripts were still being developed after June 2020.
3. Pre-production was still taking place in June 2020
4. Riot and its solicitors have lied about their timelines, which has already been proven many times over.
5. The maps, story and topography were all still being figured out and worked on long after Riot had access to the Bloodborg manuscript.
6. Shenanigans are at play.

Image 9



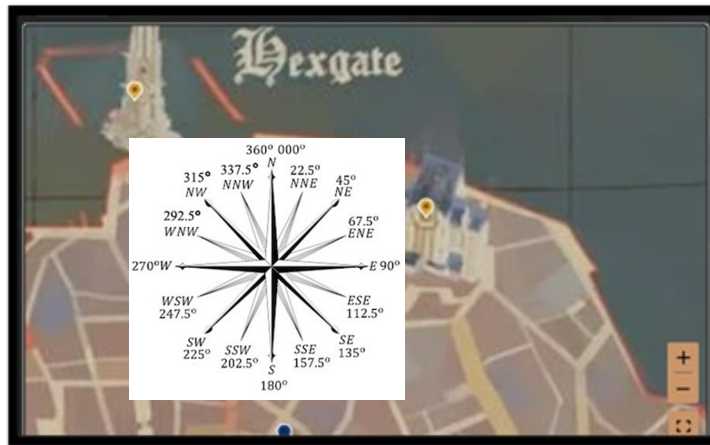
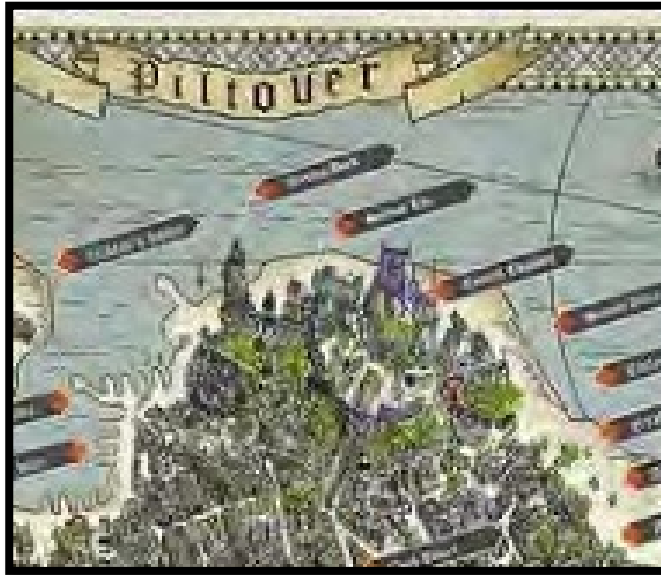
23

PLAINTIFF'S DETAILED BREAKDOWN AND ANALYSIS OF GASLIGHTING OF EPISODE 5:

SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

If we use this Charles Lee mid-2020 new map to locate the place of the shooting competition, we get the Piltover Council Building facing Southwest at a bearing of 225°

Image 10 & 11



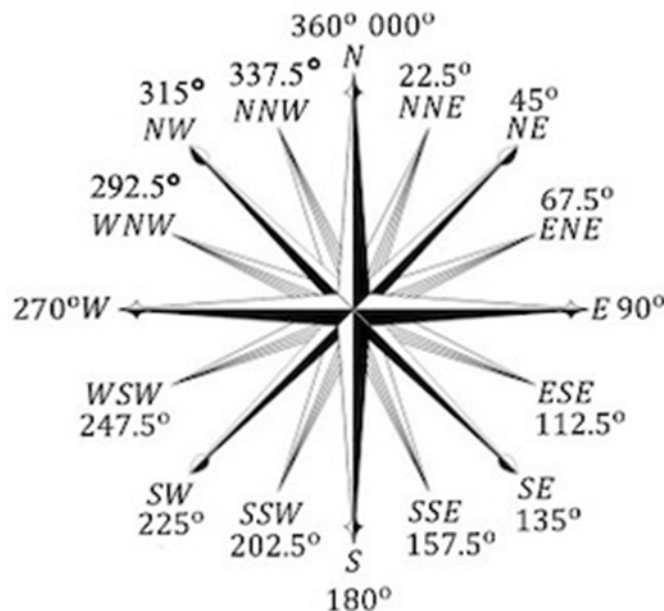
Thus, taking bearings from the new map, we can deduce the same bearings with alterations to directions, given the changes:

1, Zaun is located across the Bridge in almost a linear direction from the Piltover Council Building. Thus, now southwest. This figures on the new map correctly.

2, The Piltover Council Building is at a bearing of around 292.5° WNW, from the location of the shooting competition.

3, Thus, the shooting competition is taking place at a bearing of around 112.5° ESE from the Piltover Council Building. This places the new shooting ground in the wooded area of the new map or beyond its walls.

4, Post shooting celebrations took place at a bearing of around 157.5° SSE



PLAINTIFF'S DETAILED BREAKDOWN AND ANALYSIS OF GASLIGHTING OF EPISODE 5:

SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

Image 12 below marks these likely locations on the new map.

Image 12.



1, The red circle is the likely shooting location, in the woodlands and not in the sea, which makes more sense.

2, The blue circle is the likely post gaming celebration's location, perhaps on the edge of the city's rural area. This makes more sense.

We can therefore deduce that the visuals and story for this scene had to have been developed together, with the new map, after June 2020.

Declaration of Expertise: The Plaintiff holds UK Mountain Leader Qualification and has taught map reading to Post 16 Students of Public Services.

Image 13 & 14

Date	Type	Details	Result/Status
Single Pitch Award			
14/04/2017	Registration	Provider: Mountain Training England	Approved
Expedition Skills Module			
19/03/2017	Registration	Provider: Mountain Training England	Approved
Mountain Leader			
16/11/2016	Assessment	Module: Assessment Provider: Phill George	Pass
	Course Booking	Provider: Phill George Llanberis, Snowdonia	
22/10/2016	Training	Module: Training Provider: Phill George	Completed
17/10/2016	Course Booking	Provider: Phill George Llanberis, Snowdonia	
12/09/2014	Assessment	Module: Assessment Provider: Phill George	Defer
08/09/2014	Course Booking	Provider: Phill George Llanberis, Snowdonia	
18/04/2014	Training	Module: Training Provider: Apex Training	Completed

Details				Administration		
Director	Phill George	Venue	Llanberis, Snowdonia	Course Created	Course Start	Course End
Staff	0	Observers	0	20/11/2016	16/11/2016	16/11/2016
Provider	Phill George	Delivered In		Report Created	Submitted	Processed
				20/11/2016	20/11/2016	25/11/2016
Day Reports						
Date	Venue	Syllabus covered	Notes	Weather	Staff	
16/11/2016	Circular route around the flanks of Y Garn to Nant Peris via steep ground	Day into night navigation with aspects of security on steep ground including the South African abseil	First ML navigation / steep ground reassessment for Marc Wolstenholme who passed at a good standard!	Weather: Cloudy, Wind Speed: 10-30MPH, Visibility: Limited	Phill George	

**Legal Argument and Conclusion for Exhibit C - Piltover Council Building &
Map Inconsistencies**

Conclusion

The inconsistencies in the depiction of the Piltover Council Building and the surrounding geography across different scenes in Arcane provide compelling evidence that the maps, story, and topography were being actively revised long after Riot Games had access to the Bloodbore manuscript. The shifting positions of key locations, as demonstrated through multiple images and map analyses, indicate that Arcane's world-building was still being shaped well into 2020, contrary to Riot Games' claims that everything had been finalized prior to that period.

Furthermore, the mid-2020 creation of an updated map by Charles Lee- a key visual development artist on Arcane- confirms that the world of Piltover and Zaun was not locked in during Riot's alleged pre-2020 production timeline. Lee's own statement that this was the "8th revised version" and that it was made to assist the art team and writer's room suggests significant ongoing modifications to Arcane's setting and narrative direction after Riot had access to Bloodbore.

This contradicts Riot's sworn claims that all foundational aspects of Arcane were established years before Riot received access to Bloodbore. The visual inconsistencies and shifting geography support the broader argument that Riot's timeline is misleading and that changes were still occurring well after 2020 to accommodate elements present in Bloodbore.

1 **Legal Argument**

2 Evidence of Ongoing Revisions and Misrepresentation of Development Timeline

3 Riot Games and its legal representatives have repeatedly asserted that Arcane’s
4 scripts, world-building, and setting were fully developed by the end of 2019. However, Charles
5 Lee’s 2020 map revision contradicts this assertion.
6

7 Given that key geographical elements such as Still Water Hold were not included
8 in the map until after June 2020, it is evident that Riot was still actively shaping Arcane’s
9 narrative and setting at a time when they had access to Bloodborg.
10

11 Under Federal Rule of Civil Procedure 26(g), parties are required to make truthful
12 and reasonable representations in discovery. If Riot knowingly misrepresented the timeline of
13 Arcane’s development, this constitutes misconduct warranting potential sanctions.
14
15

16 *Likelihood of Direct Influence from Bloodborg*

17 If Arcane’s setting and geography were still being actively adjusted after Riot’s
18 access to Bloodborg, it further supports the pattern of “just enough masking” while retaining
19 core similarities, a pattern consistent with copyright infringement.
20
21
22
23
24

Courts have found that demonstrable modifications to a work that align with a plaintiff's prior work can serve as circumstantial evidence of copying (Fisher-Price, Inc. v. Well-Made Toy Mfg. Corp., 25 F.3d 119 (2d Cir. 1994)).

Riot's Shifting Narrative Raises Issues of Bad Faith

Riot's shifting explanations and timeline contradictions reflect a lack of transparency and may indicate deliberate obfuscation of facts.

In *Kourtis v. Cameron*, 419 F.3d 989 (9th Cir. 2005), the court emphasized that inconsistencies in a defendant's narrative may undermine independent creation claims.

The plaintiff's expertise in map reading and navigation, coupled with concrete visual and directional inconsistencies, further strengthens the argument that Riot's timeline is unreliable.

Request for Sanctions and Judicial Oversight

Given the pattern of inconsistencies, timeline manipulation, and continued misrepresentations, Plaintiff requests that the Court order:

A forensic review of Arcane's pre-production files to determine actual script and map development timelines.

1 Sanctions under Rule 11 of the Federal Rules of Civil Procedure if Riot is found
2 to have knowingly misrepresented its development timeline.

3 A deposition of Charles Lee and other key visual development staff to confirm
4 when Arcane's geography and setting were finalized.
5

6 7 **Final Legal Conclusion**

8 The geographical inconsistencies in Arcane, combined with evidence of continued
9 development and map revisions well after Riot had access to Bloodborg, provide compelling
10 evidence that Arcane's world-building was not finalized prior to 2020. This undermines Riot's
11 independent creation claim and further supports the argument that Bloodborg played a significant
12 role in shaping Arcane's setting.
13

14
15 Given the contradictory statements regarding pre-production timelines, deliberate
16 masking of changes, and evidence that Riot continued shaping Arcane's world long after
17 receiving Bloodborg, Plaintiff urges the Court to allow this case to proceed to full discovery and
18 trial. If Riot's timeline misrepresentations are confirmed, sanctions and legal repercussions
19 should follow to deter further litigation misconduct.
20
21
22
23
24

EXHIBIT D- MARCUS'S DAUGHTER REN.

In the next scene we see the funeral of the Enforcers who died from Jinx's terrorist attack. Sheriff Marcus, the conspirator, is giving a speech. His daughter Ren is standing in front of him. She appears in a few scenes, especially when Marcus is at home, showing his softer, more human side.

It is understood that, although Marcus is corrupt and conflicted, he is often motivated towards protecting and loving his daughter.



1 **D1- Ru-bunny (Ruby) Vs Ren**

2 This is alleged to be remarkably similar to that of Chris's POV storyline in
3 Bloodborg.

4 **In Bloodborg,** Chris knows that The Ark has done evil things but allows himself
5 to be mind controlled to be with his daughter and wife again. He reasons that at least he can
6 protect his family from being on the strong side of the rich and powerful, but his actions play on
7 his conscience.
8

9
10 **In Bloodborg,**

11
12 1, *"After a successful six months working on intel on the OWA, he was tried under*
13 *Ark court-martial proceedings. He was given a choice to sacrifice his lifeblood and his family for*
14 *Gaia. Or to serve Gaia and the Ark unconditionally which meant to be reinstated as a Captain*
15 *and being transferred to the Ark Intelligence Corps. He chose the latter and fully believed in*
16 *saving Gaia."*
17

18
19 2, *"The thump at the door was his daughter entering his office: six-year-old Ruby*
20 *Redgrave, Little Ru-bunny.*

21 *'Daddy Daddy, pancakes for breakfast, mummy said I can help you make them,'*
22 *said Ruby running over, still in her bunny rabbit pyjamas, with one pyjama leg pulled up to the*
23 *shin and dragging bob-face bunny by his ears.*
24

1 *Ruby climbed up Chris's graphite infused carbon fibre legs and onto his lap. She*
2 *sat bob-face on her bent knees.*

3 *'Are you hot daddy?'*

4 *'oh, ooh pancakes hey, I love making pancakes with my Ru-bunny,' he said*
5 *squeezing Ruby, kissing her on the head.*

6 *'Daddy, your hands are wet.'*

7 *'I know bunny, daddy's been working hard this morning,' he said wiping the*
8 *beads of sweat from his brow.'*

D2- Ren and Maddie



Ren is a fair skinned little girl with orange hair and grey/ blue eyes. She has some freckles and wears a grey outfit. Ren's name is mentioned in Episode 7 (The Boy Savior). In this episode, Silco visits Marcus at his home and, while threatening him, he subtly mentions Ren's name, implying that Marcus's daughter could be in danger if he doesn't comply.

Maddie Nolen is a Junior Officer Enforcer, later a part of Caitlyn Kiramman's strike team, being one of her close friends, and former lover. Maddie shares striking similarities in appearance to Ren but grown up.

Fan Speculation

There has been speculation among LOL and Arcane fans that Ren and Maddie were intended to be the same character. Ren appears in Arcane's concept art, described as Marcus's daughter. Some believe the team may have renamed or simplified the character during production. Their designs are similar, though maddie is older and more detailed when the story has timeshifted in Season 2.

Cut Content or Narrative Adjustments

It's possible that Ren was planned to have a bigger role but was later reduced to a minor character and never shown again. In a show with such a high budget, with every second costing big bucks, it does not make sense to build her up to cut her out.

Then with Maddie appearing in Season 2, with no backstory, seemingly cut from the same design, it is more plausible that late changes took place to change Ren into Maddie.

Riot Games and Fortiche have not officially confirmed whether Ren and Maddie are the same character or if Ren was simply cut during development. Fans continue to debate this, but the most widely accepted theory is that Ren was reworked from Marcus's daughter into Maddie Nolen in the final version of Arcane.

1 **Key allegation for D** – Late changes made to mask IP infringement.

2 It is alleged that; Riot were informed of the IP infringement in November 2021.

3 After being informed of the IP infringement and cases to follow, Linke and Yee took many
4 actions and made many changes to mask infringement, including making Ren and Maddie two
5 separate characters.
6

7 Why? Having a high ranking traitor's daughter grow up to be a traitor aligns to
8 perfectly with Bloodborg narratives (Chris and his daughter Ru-bunny) and with Bloodborg's
9 cyclical storytelling.
10

11
12 **Legal Argument and Conclusion for Exhibit D – Marcus's Daughter Ren &**
13 **Late Character Changes**

14
15 **Conclusion**

16 The narrative inconsistencies surrounding Marcus's daughter, Ren, and the
17 introduction of Maddie Nolen in Arcane raise significant questions about the timeline and intent
18 behind character development decisions. The abrupt disappearance of Ren from the series,
19 despite her initial narrative significance, and the later appearance of Maddie- who shares striking
20 similarities to Ren but is introduced without backstory- suggests potential late-stage
21 modifications to the script and character roster.
22
23

1 The most plausible explanation for these changes is that Riot Games altered Ren's
2 character following the IP infringement allegations in November 2021, to obscure direct
3 similarities to Bloodborg. The parallels between Ren/Maddie and Bloodborg's Chris/Ruby (Ru-
4 bunny) are too significant to dismiss as mere coincidence. Riot's actions appear to be an example
5 of deliberate masking, where elements are slightly altered post-allegation to create artificial
6 distinctions while retaining the core narrative.
7

8 9 **Legal Argument**

10 *1. Substantial Similarity and Narrative Parallels*

11
12 Bloodborg features Chris, a conflicted officer who chooses loyalty to a corrupt
13 organization to protect his daughter, Ruby ("Ru-bunny"), creating an internal moral struggle.
14

15 Arcane features Marcus, a conflicted Enforcer who chooses loyalty to Silco's
16 corrupt organization to protect his daughter, Ren, showing a similar moral struggle.
17

18 Both Ruby and Ren are young daughters of compromised officers, serving as
19 humanizing elements to otherwise morally gray characters.

20 Both Chris and Marcus ultimately pay the price for their betrayal, reinforcing the
21 cyclical storytelling present in Bloodborg.
22

23 The alleged transformation of Ren into Maddie in Season 2 suggests an attempt to
24 conceal narrative borrowing by aging and renaming the character.

1 This pattern of “late-stage reworking” to evade infringement claims aligns with
2 copyright masking, a tactic where minor alterations are made to reduce legal risk while keeping
3 core similarities intact.
4

5
6 *2. Evidence of Riot’s Post-Allegation Changes*

7 Riot was informed of IP infringement claims in November 2021.

8 Following this, Ren’s storyline abruptly disappeared despite her initial importance
9 to Marcus’s character arc.
10

11 A new, visually similar character, Maddie Nolen, was introduced in Season 2
12 without an organic backstory, suggesting a repurposing of Ren’s role.

13 Fan speculation supports this claim, with many Arcane viewers noticing the
14 striking resemblance and questioning why Ren was discarded so abruptly.

15 Riot Games and Fortiche have never officially clarified whether Ren and Maddie
16 were originally the same character, reinforcing suspicion.
17

18 This supports the claim that Riot Games engaged in deliberate post-allegation
19 modifications to obscure copyright infringement.
20
21
22
23
24

1 3. *Riot's Pattern of Narrative Retconning and Masking*

2 Riot has a documented history of retroactively altering lore and character arcs in
3 League of Legends and Arcane, making it plausible that similar modifications were made in
4 response to IP concerns.
5

6 The rewriting of backstories to create artificial distinctions while maintaining
7 narrative parallels is a known tactic in IP masking.

8 Courts have held that post-allegation changes to allegedly infringing content can
9 indicate a consciousness of guilt (See *Repp v. Webber*, 132 F.3d 882 (2d Cir. 1997)).
10

11
12 4. *Request for Sanctions and Legal Remedies*

13 Plaintiff requests that the Court order Riot Games to produce internal
14 communications and development records related to Ren and Maddie Nolen.

15 If Riot is found to have made deliberate modifications after learning of the
16 Plaintiff's claims, this constitutes bad-faith litigation tactics and warrants judicial sanctions.
17

18 Depositions of key developers should be ordered to determine the timeline and
19 rationale behind Ren's removal and Maddie's introduction.
20
21
22
23
24

1 **Final Legal Conclusion**

2
3 The evidence presented strongly suggests that Riot Games engaged in late-stage
4 modifications to obscure narrative similarities between Arcane and Bloodborg following the
5 Plaintiff's copyright infringement claims.
6

7
8 Given the chronology of events, character similarities, and abrupt disappearance
9 of Ren, it is highly probable that Riot Games took deliberate action to mask their use of
10 Bloodborg's cyclical storytelling and father-daughter dynamics. If Riot's timeline
11 misrepresentations and masking efforts are confirmed, legal sanctions and further discovery
12 should follow to ensure transparency and accountability in this litigation.
13
14
15
16
17
18
19
20
21
22
23
24
25

Exhibit E – Hexframe vs The Wall (The Stand)

The base of the Hexgate is called the Hexframe. The Hexframe is the large mechanical foundation that stabilizes and powers the Hexgates, allowing for instant transport between Piltover and distant locations. It houses Hextech gemstones, which provide the energy necessary for long-distance teleportation. The golden ring-like structure you see at the bottom of the Hexgates anchors them in place, ensuring safe and precise travel.

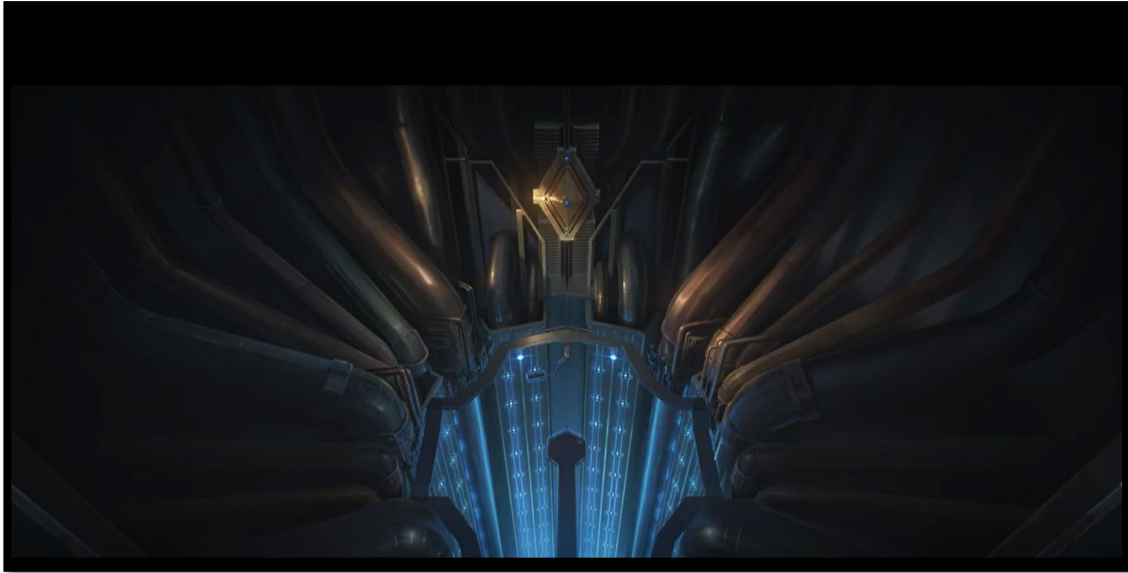
Why is the Hexframe Important?

Stabilization: The Hexframe controls the alignment of the Hexgate to prevent malfunctions.

Security: Piltover enforcers and scholars closely guard its technology to keep it exclusive to Piltover's elite.

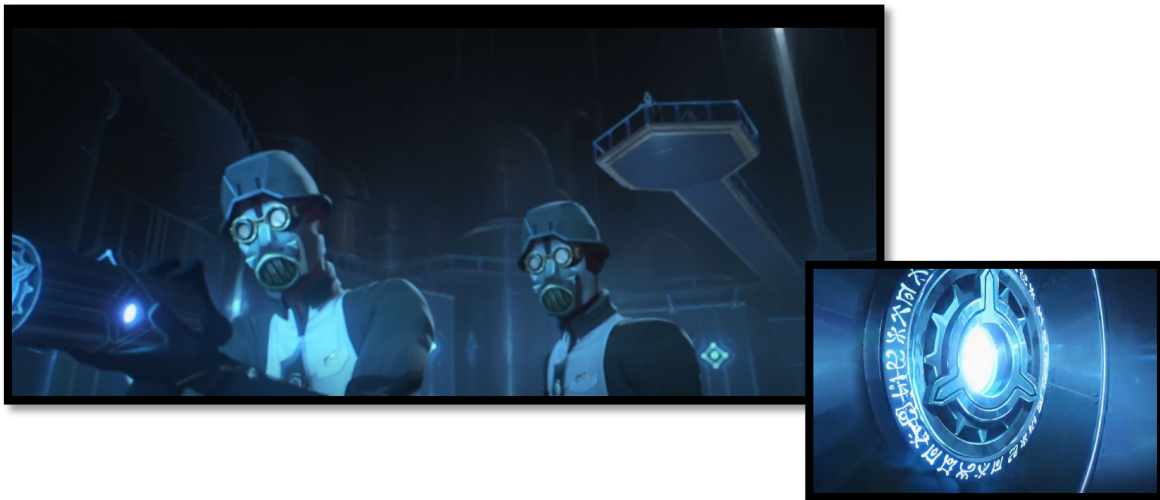
Symbol of Piltover's Progress: The Hexgates revolutionized trade, making Piltover the wealthiest city in Runeterra.

1 **Image 1- We see the energy converging in pipes above the Hexframe.**



12
13 **Image 2 & 3- We see the nuclear like batons being placed into the chambers.**

14 **The workers are wearing respirators and protective eq uipment, confirmed that the**
15 **radiation is toxic.**



1 **Images 4 & 5- We see the diamond shape energy, flowing up inside the walls.**



19
20 **The Hexframe itself does not come alive, but its technology and the Hextech**
21 **gemstones powering it exhibit a form of reactive energy that almost makes it feel sentient.**
22
23 **In Arcane, the Arcane itself is not a living entity, but it is portrayed as a mystical and**
24 **powerful force that can behave unpredictably, almost as if it has a will of its own.**

1 Images 6 & 7 – In Bloodborg, “The Wall” pattern was modelled after ancient
2 stepwells in India



25 45

26 PLAINTIFF’S DETAILED BREAKDOWN AND ANALYSIS OF GASLIGHTING OF EPISODE 5:

27 SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE
28

1 **Main Allegation** – it is alleged that the Hexframe in Arcane was “Swiped and
2 “Griped” from The Wall, sometimes called The Stand, of Bloodborg. The Stand is a central plot
3 setting and feature in Bloodborg.
4

5 Indeed, Josh’s POV is happening as a war is about to begin at The Stand. In
6 Arcane season 2, the final war also takes place at the “Hexframe” and “Hexgates.”
7

8 **In Bloodborg:**

9 1, *“The wall must have been repairing itself. From the bottom, each hexagon is*
10 *looping with a green liquid, building up into the sky.”*
11

12
13 2, *“On the wall again. I hate guarding The Stand on the best of days, this day is*
14 *worse, this might be the day I take another humans life. Nullifidian or not they are still humans,*
15 *or near like. Well most of them are, in my opinion.”*
16

17
18 3, *“I exhaled hard. My respirator fogged up. I inhaled a vacuum; a spike of*
19 *darkness filled my organs. My hands trembled; desert dust lined my throat. My diaphragm*
20 *danced with the racket of the advance of the first surge of the Old-World Army (OWA). I fell on*
21 *the first step as I watched the other defenders climb the giant wall. The ventilation grill of my*
22 *respirator was blocked by my collar.”*
23

1 4, “I followed behind her climbing the massive stone stepped wall to the first
2 junction, the steps jutted from the wall like stone triangles. Apparently, the Quartermaster told
3 another recruit, Simon Redgrave, that the pattern was modelled after some ancient step wells in
4 a place called India, to allow for many Defenders to ascend them at once. Looks pretty cool if
5 I’m honest.
6

7 ‘We Stand. We Stand. We Stand.’ We approached the top of the wall. The burning
8 was replaced by a stench of gun powder and metallic rust.”
9

10 5, “I’ve just searched my in-brain system to find out if The QM was here for The
11 Rupture six years ago, but I can’t find any information on it. The Rupture, as it is known, is the
12 only time that the wall has ever been infiltrated. Rumour has it, that it wasn’t the OWA who
13 broke the wall. It was another militant group, but I can’t recall the name of them. Anyway, the
14 rumour is that they broke in by breaking out. They somehow hacked a Defenders In-brain
15 computer system, this was before Veda took over the systems, and they convinced him to defect
16 or they might have brainwashed him or her... it might have been a her. Anyhow, the defector is
17 alleged to have switched down the hard-shell and used a fusion tab on the wall to blow a massive
18 hole in it.”
19
20
21

22 6, “WD PPC is integrated inside the wall, it has a single block out range of 200
23 meters, over, under and around the wall. It has a concentrated heat detonation range of 100
24

1 metres, over, under and around the wall. It cannot locate firing points, it cannot fire, it cannot
2 seek out missiles, it does not think.

3 'So, Armadillo thinks? Is it a person?'

4 'No kid it's not a person.'

5 'Why can't we use Armadillo in the day?'

6 'The wall also requires a lot of energy and daily maintenance, the systems work
7 very well together, but without either one, we are open to bombing for twelve hours of day or
8 night.'

9 'How is the wall powered?'

10 'One question kid, I offered one question.'

11 'Ok sorry, I guess I know how its powered anyway.'

12 'Do you now, smart arse. How's that then?'

13 'It's fusion-powered, I guess it is anyway. It must be because it is so gigantic,
14 Fusion energy is the only power I know of which could sustain such a big structure for twelve
15 hours. It also explains the need for respirators, to protect us from the fumes, but I do wonder
16 why the High Commander does not wear is mask at night.'

17 'Good guess kid, and your nearly right, it's fusion mixed with old dirty nuclear,
18 the Nuclear lines run deep under the ground, cooled by the sea. Mixing the Fusion and old
19 Nuclear together is what causes the deadly gases and toxins during the day whilst the system is
20 replenished, and the liquefied energy is on the move; being fed back up the inside of the wall. At

1 *night the wall, whilst switched on, gives off less gas, but it is still toxic, therefore the High*
2 *Commander should still be wearing his mask, he is just bonkers?''*

3
4
5 7, *“The stone wall was now sheathed in a honeycomb of neon yellow and black. It*
6 *looked like a giant beehive (Bees are long extinct, but I’ve read much about them). The wall must*
7 *have been repairing itself. From the bottom, each hexagon is looping with a green liquid,*
8 *building up into the sky.”*

**Legal Argument and Conclusion for Exhibit E – Hexframe vs The Wall (The
Stand)**

Conclusion

The structural, functional, and narrative similarities between Arcane’s Hexframe and Bloodborg’s The Wall (The Stand) suggest a deliberate adaptation of core thematic and visual elements. The Hexframe serves as a central power structure and battlefield in Arcane, just as The Wall is a key stronghold and energy hub in Bloodborg. The convergence of energy, the presence of respirators due to toxic exposure, the role of a fortified structure in controlling warfare, and the architectural design further solidify the claim that Riot Games borrowed heavily from Bloodborg in constructing the Hexframe and its function in Arcane.

Moreover, seems as we have already covered that The Hexgates are identical to D’borg’s arm-embedded device in Bloodborg, which allows for teleportation travel, and that the Hex gems powering the Hexframe are a direct swap out of fusion energy in Bloodborg, we can safely deduce with logical reasoning, that the Hexgates, the Hexframe and everything about them, is lifted from Bloodborg... Alleged.

The timeline of Arcane’s development aligns with Riot’s access to Bloodborg, supporting the allegation that Riot Games made deliberate efforts to incorporate and mask elements from Bloodborg after gaining access to Plaintiff’s manuscript. The thematic overlap, technological parallels, and specific design elements in the Hexframe vs. The Wall are beyond generic storytelling conventions and point directly to substantial borrowing.

1 **Legal Argument**

2
3 *1. Substantial Similarity and Direct Borrowing*

4
5 2.

6 **Bloodborg's The Wall** is a massive structure powered by fusion and nuclear
7 energy, requiring constant maintenance, energy replenishment, and respirator use due to toxic
8 fumes.

9 **Arcane's Hexframe** also requires fusion-based Hextech energy, features workers
10 wearing respirators, and exhibits energy visibly moving through pipes and conduits.

11
12
13 The visual representation of energy flowing through hexagonal structures in both
14 works further supports substantial similarity.

15
16 Under *Feist Publications, Inc. v. Rural Telephone Service Co.*, 499 U.S. 340
17 (1991), originality is required for copyright protection, but where highly specific similarities
18 exist between two works, substantial similarity can establish copyright infringement.
19
20
21
22
23
24

2. Unique Conceptual and Functional Parallels

Both structures serve as power hubs for warfare: The Wall in Bloodborg is central to the war effort, controlling the battlefield. Similarly, the Hexframe in Arcane is crucial for maintaining teleportation and is a key conflict zone in Season 2.

Both are protected through strict security measures and are integral to elite control: Piltover Enforcers guard the Hexframe, while Bloodborn's The Wall is maintained by defenders trained in warfare.

The Wall regenerates itself through energy cycling, while the Hexframe channels liquid Hextech energy through its structure, visually mirroring the self-repairing wall described in Bloodborg.

3. Request for Discovery and Sanctions

Plaintiff requests access to Riot Games' internal development materials, concept art iterations, and correspondence related to the creation of the Hexframe.

1 *Plaintiff seeks depositions of Arcane’s visual development team to determine*
2 *whether elements of Bloodborg directly influenced the Hexframe’s design.*
3

4
5 **Final Legal Conclusion**
6

7 The narrative, functional, and visual similarities between Arcane’s Hexframe and
8 Bloodborg’s The Wall (The Stand) strongly suggest unauthorized adaptation and borrowing. The
9 energy-based, self-sustaining, heavily guarded structures central to warfare, as well as their
10 unique architectural and operational characteristics, demonstrate that the similarities are neither
11 coincidental nor generic to the sci-fi/fantasy genre.
12

13
14 Given the chronological alignment of Arcane’s late-stage development
15 refinements and Riot’s access to Bloodborg, Plaintiff asserts that Riot Games engaged in
16 deliberate borrowing and subsequent infringement masking. If further evidence in discovery
17 confirms post-allegation changes intended to obscure copying, legal sanctions should follow, and
18 this case should proceed to trial.
19
20
21
22
23
24

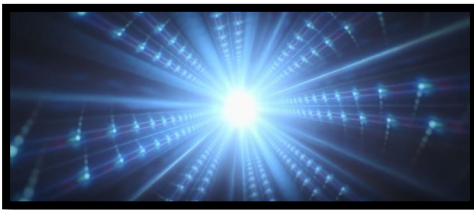
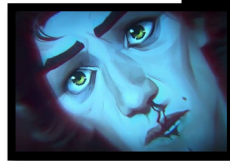
Exhibit F- Blood Mixed with Hex Energy awakens the Arcane.

In the next scene we see Viktor cough up blood. Blood drips from his mouth and nose down onto the base of the Hexframe. This is when the “Arcane” magic begins to communicate with Viktor. Thus the hex base, at the core of the Hexframe isn’t itself alive, but it takes on living and evolving features. It acts more like a transponder of The Arcane, which is an ancient magic, which is kind of alive in some abstract way.

In Bloodborg, the Wall is the same in many ways. It isn’t alive like humans or animals, but it acts almost as a living organism, but is like a transponder of The Armadillo PCC, which are alive.

In both, The Wall and the Hexframe act as an augmentation of a different living entity. Because of trade secrets, The Plaintiff is not willing, and does not feel the need to, explain more about Armadillo PCC at this point.

1 We see Viktor's vision swaying and swirling as the Hexframe morphs and
2 whispers to him.



26 55

27 PLAINTIFF'S DETAILED BREAKDOWN AND ANALYSIS OF GASLIGHTING OF EPISODE 5:

28 SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

1 To stay on this Exhibit, we've skipped a few scenes of episode 5 which we will
2 continue with in the next exhibits.

3 The image below shows the Hexcore. On it we see M. W. W. The plaintiff alleges
4 that this is again taunting the Plaintiff, M.W. W...olf. It's not a coincidence that M.W. shows up
5 perhaps over a hundred times throughout Arcane.
6

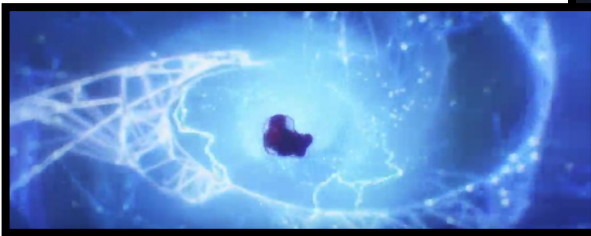
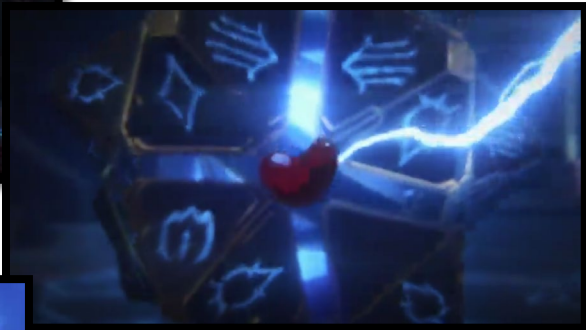


25 56

26 PLAINTIFF'S DETAILED BREAKDOWN AND ANALYSIS OF GASLIGHTING OF EPISODE 5:

27 SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE
28

1 Trying and failing to brake the Hexcore, Viktor gets angry and stands up. He
2 hears the strange calling sounds again and gets dizzy again. He coughs up blood again. He faints,
3 the Hexcore laps up his blood. His blood fuses into the technology crossed with hex energy and
4 Arcane magic. Thus, Blood engineering.



**Comparison Between Bloodborg: The Harvest and Arcane (Exhibit F - Blood
Mixed with Hex Energy Awakens the Arcane)**

1. Core Similarities

The key similarity between Bloodborg and Arcane is the idea that a seemingly inanimate structure (Hexframe/The Wall) acts as a transponder for a powerful force (Arcane energy/Armadillo PCC).

A. The Hexframe in Arcane vs. The Wall in Bloodborg

In Arcane, the Hexframe isn't alive but acts as a transponder for the Arcane.

Exhibit F states: Thus the hex base, at the core of the Hexframe isn't itself alive, but it takes on living and evolving features. It acts more like a transponder of The Arcane, which is an ancient magic, which is kind of alive in some abstract way.

In Bloodborg, The Wall operates in a similar manner:

The Wall isn't alive like humans or animals, but it acts almost as a living organism, but is like a transponder of The Armadillo PCC, which are alive.

Parallel Theme: Both structures channel an external power source that appears somewhat sentient but is not truly alive on its own.

1 *B. Blood Awakening Power*

2 **In Arcane**, Viktor's blood drips onto the Hexframe, causing the Arcane to
3 respond to him: Blood drips from his mouth and nose down onto the base of the Hexframe. This
4 is when the 'Arcane' magic begins to communicate with Viktor.
5

6
7 **In Bloodborg**, the interaction between The Wall and the Armadillo PCC seems to
8 involve a similar triggering process, though blood is not explicitly mentioned, blood is a key
9 ingredient of all of the Blood drugs/ energy heavily featured in Bloodborg in many different
10 ways. We see the Crab Bots Collecting blood in massive tanks, which are converted into the
11 wall. The idea is that War is fought with Blood. Hence the title, Bloodborg: The Harvest.
12

13
14 *"If Armadillo PPC were to fail, we would be deep in the shita... They have been*
15 *trying to find out about Armadillo PPC, its location and all information about it is restricted to*
16 *the highest of ranks."*
17

18 **Parallel Theme:** In both cases, a powerful force is awakened or activated when
19 the central structure (Hexframe/The Wall) interacts with an external biological or technological
20 component.
21
22
23
24

1 **C. Communication & Visionary Effects**

2 **In Arcane**, after Viktor’s blood interacts with the Hexframe, he experiences
3 visions and auditory hallucinations: We see Viktor’s vision swaying and swirling as the
4 Hexframe morphs and whispers to him.
5

6
7 **In Bloodborg**, The Wall and Armadillo PPC seem to affect the way reality is
8 perceived, particularly in relation to the highly classified nature of its operations:

9 *“The rockets seemed to think for themselves, hovering and searching, preying like*
10 *a grizzly bear on a salmon run, waiting for the silly salmon to jump straight into the jaws of the*
11 *beast.”*
12

13 *“Gaia please...”* (implying that the world itself is reacting, (It is) much like the
14 Arcane in Arcane).
15

16 **Parallel Theme:** In both cases, a mystical or technological force interacts with a
17 character’s perception, making them see or feel something beyond normal reality.
18
19
20
21
22
23
24

1 **2. The "M.W.W." Allegation**

2 Exhibit F alleges that “M.W.W.” appears in Arcane numerous times, implying a
3 reference to M. W. Wolf.

4 Final Conclusion

5 The concept of a transponder-like quasi sentient structure awakening a greater
6 power via Blood harvesting exists in both stories, this isn’t a trope.
7

Legal Argument and Conclusion for Exhibit F – Blood Mixed with Hex

Energy Awakens the Arcane

Conclusion

The parallels between Arcane's Hexframe and Bloodborg's The Wall (The Stand) extend beyond structural similarities, revealing an underlying conceptual and thematic replication. The portrayal of a seemingly inanimate structure acting as a transponder for an external force, blood engineering as a catalyst for awakening, and the distortion of perception upon interaction with the structure are all key elements present in both works.

The use of blood as an activating agent is a particularly unique narrative choice, distinct from common genre tropes. Arcane's depiction of Viktor's blood fusing with Hextech energy to awaken the Arcane mirrors Bloodborg's theme of war, blood harvesting, and its connection to a greater force (Mother Gaia and Armadillo PCC). The non-living but reactive nature of the Hexframe closely parallels The Wall, which similarly interacts with external influences in Bloodborg.

Additionally, the appearance of "M.W.W." in Arcane, alleged to be an intentional reference to Plaintiff M.W. Wolf, further raises concerns about deliberate insertion of taunting elements and direct borrowing from Bloodborg. The frequency of "M.W.W." in Arcane suggests that this was not a coincidence but a deliberate inclusion.

1 The Plaintiff asserts that these combined factors provide clear and compelling
2 evidence of unauthorized adaptation and borrowing, further substantiating the claims of
3 intellectual property infringement.
4

5 6 **Legal Argument**

7 8 *1. Unique and Protectable Elements Present in Both Works*

9 Transponder-like Structures: Both the Hexframe in Arcane and The Wall in
10 Bloodborg function as non-living conduits that channel a powerful force.
11

12
13 Blood as an Activation Mechanism: Viktor's blood awakening the Arcane in
14 Arcane mirrors Bloodborg's use of blood harvesting and energy fusion within The Wall.
15

16
17 Altered Perception Upon Interaction: Both works depict characters experiencing
18 hallucinations, visions, and auditory distortions when engaging with these structures.
19

20 These elements, taken together, demonstrate a highly specific and protectable
21 narrative structure that is not a common trope but an original creative expression under copyright
22 law.
23

1 Minor adjustments to disguise direct borrowing are a known tactic in copyright
2 masking (See Fisher-Price, Inc. v. Well-Made Toy Mfg. Corp., 25 F.3d 119 (2d Cir. 1994)).
3

4
5 *3. Request for Discovery and Sanctions*
6

7 If evidence shows that Riot refined these elements post spring 2020, it strengthens
8 the argument for copyright infringement and intentional modification.
9

10 Plaintiff requests full discovery on script iterations and internal discussions
11 regarding the Hexframe and its connection to blood-based activation.
12

13
14 Plaintiff seeks to depose Riot Games' writers and artists regarding any inspiration
15 drawn from external sources.
16

17
18 If it is found that Riot intentionally included “M.W.W.” as a veiled
19 acknowledgment of Plaintiff’s work, sanctions for bad-faith litigation tactics should be
20 considered.
21

1 **Final Legal Conclusion**

2
3 The concept of a seemingly inanimate transponder structure channeling external
4 power through blood engineering, causing an altered perception of reality, is highly unique and
5 specific. The fact that Arcane features this exact concept with multiple direct parallels to
6 Bloodborg strongly suggests that these elements were not independently created but rather
7 derived from Plaintiff's work.
8

9
10 Furthermore, the repeated presence of "M.W.W." in Arcane is highly suspect,
11 providing potential direct acknowledgment of Riot's awareness of Plaintiff and his work. Given
12 the highly specific similarities and potential intentional masking, Plaintiff asserts that Riot
13 Games' claim of independent creation is untenable.
14

15
16 The Court should allow full discovery into Riot Games' internal documentation
17 and impose legal consequences if intentional infringement is found.
18
19
20
21
22
23
24

**Exhibit G- Runes Gateway vs Mother Gaia and the Higher Consciousness in
Bloodborg.**

In the next scene Jinx talks to herself. She says, “It’s all about these magical rune
things, they make some magical gateway or something.”

Thus the blood awakening of The Arcane has made some kind of gateway for
transportation. Kinda like Bluebeam of Bloodborg but much less scientific. In Arcane, Rune’s
are like lines of code in Jayce’s notebook which open gateways to thin the veil between magic
and the world, which allows the Arcane to seep into the world and use Viktor as a conduit fake
Christ like figure.

In Bloodborg, the spilling of so much blood and the corruption of the planet, has
thinned the veil between realms, awakening Mother Gaia who has also sent people of great
importance and power (Like Mel Medarda) to save the world.

**Legal Argument and Conclusion for Exhibit G – Runes Gateway vs. Mother
Gaia and the Higher Consciousness in Bloodborg**

Conclusion

The conceptual and thematic parallels between Arcane’s Runes Gateway and Bloodborg’s Mother Gaia and Higher Consciousness strongly indicate a borrowed and adapted framework. In Arcane, the Runes function as magical codes that thin the veil between realms, allowing Arcane energy to seep into the world, while in Bloodborg, the corruption and bloodshed on the planet thins the veil between realms, awakening Mother Gaia and triggering higher consciousness.

Both narratives utilize the idea of transcendental gateways, where an external force (Arcane energy in Arcane; Gaia’s awakening in Bloodborg) interacts with the world through a thin veil, fundamentally altering existence. The concept of a Christ-like conduit (Viktor in Arcane and chosen figures in Bloodborg) further cements the structural overlap between these two works.

This level of similarity is not common to fantasy or science fiction tropes and suggests a direct adaptation of Bloodborg’s key thematic structure into Arcane. Given the chronology of Arcane’s development, which overlaps with Riot Games’ access to Bloodborg, it is highly likely that these thematic and narrative elements were incorporated into Arcane after exposure to Bloodborg.

1 **Legal Argument**

2
3 *1. Substantial Similarity Between Runes Gateway and Mother Gaia's Awakening*

4
5
6 **In Arcane**, Runes in Jayce's notebook function as a key to opening a gateway,
7 thinning the veil between realms.

8 **In Bloodborg**, corruption and bloodshed thin the veil, allowing Mother Gaia's
9 presence to reawaken and communicate with chosen individuals.
10

11
12 Both serve as world-altering forces, fundamentally changing the laws of nature
13 and existence.
14

15 Under *Sheldon Abend Revocable Trust v. Spielberg*, 748 F. Supp. 2d 200
16 (S.D.N.Y. 2010), substantial similarity in core narrative structure and unique world-building
17 elements can serve as evidence of copyright infringement.
18

19
20 **2. Thematic Overlap and the Christ-Like Conduit Figure**

21
22
23 In *Arcane*, Viktor's body is transformed by Arcane energy, positioning him as a
24 conduit between magic and reality, akin to a false messianic figure.
25

1
2 In Bloodborg, chosen figures, including high-status individuals like Mel Medarda,
3 are sent to counteract planetary corruption and serve as messianic saviors.
4

5
6 Both narratives use “higher” or mystical forces choosing specific individuals to
7 act as vessels for world-changing events.
8

9
10 This highly specific thematic structure suggests direct adaptation, rather than
11 mere genre convention.
12

13 3. Riot’s Possible Post-Allegation Adjustments as a Form of Copyright Masking 14

15 Riot Games was informed of potential IP infringement in November 2021.
16

17
18 Arcane’s finalized version includes a diluted, less-scientific version of
19 Bloodborg’s higher consciousness concept, indicating potential masking of borrowed elements to
20 avoid direct detection.
21
22
23
24

1 Courts have found that post-allegation modifications to an allegedly infringing
2 work can serve as evidence of willful infringement (See Repp v. Webber, 132 F.3d 882 (2d Cir.
3 1997)).
4

5
6 *4. Request for Discovery and Further Investigation*
7

8 Plaintiff requests access to internal Riot Games' documentation on the creation of
9 the Rune Gateway concept, including its origins and influences.
10

11
12 Plaintiff requests depositions of Arcane's writers and creative leads to determine
13 whether elements of Bloodborg were discussed or referenced in development.
14
15
16
17
18
19
20
21
22
23
24

Final Legal Conclusion

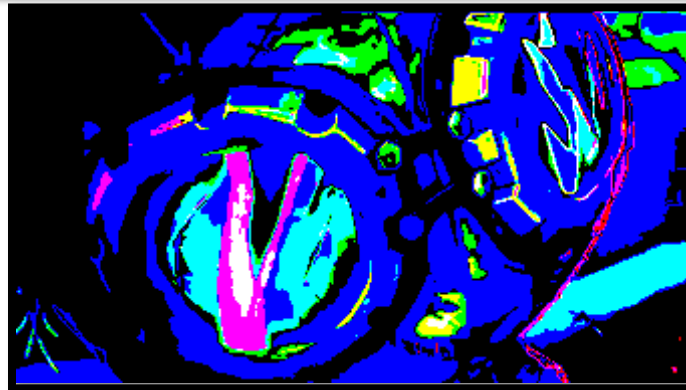
The concept of a veil between realms being weakened through an external force, thereby allowing a mystical or higher power to alter the world, is a highly specific and original narrative device. The overwhelming thematic and structural similarities between Arcane's Rune Gateway and Bloodborg's Mother Gaia and Higher Consciousness strongly indicate that Riot Games adapted these elements from Bloodborg into Arcane.

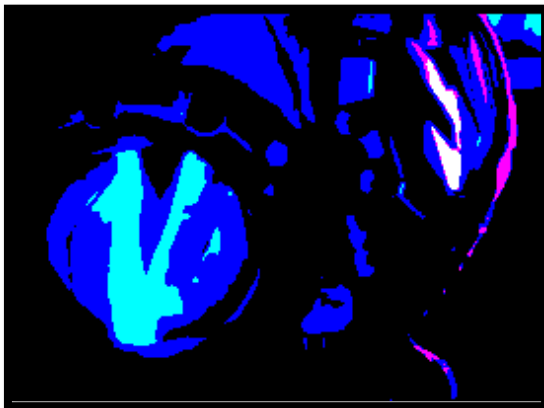
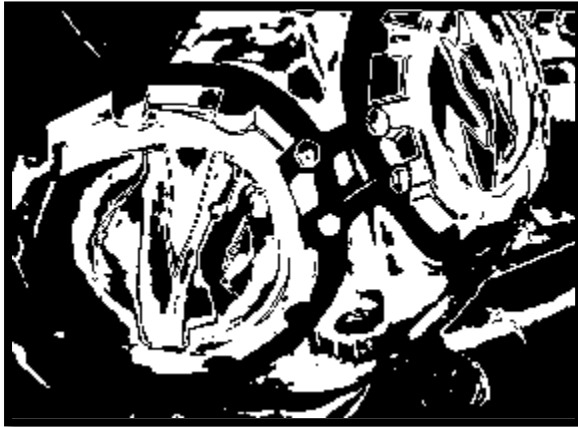
Given the chronological alignment between Arcane's final development stages and Riot Games' access to Bloodborg, it is highly likely that these elements were borrowed and altered post-allegation. Plaintiff asserts that Riot Games' independent creation defense is untenable and urges the Court to grant full discovery to uncover the extent of unauthorized adaptation. If post-allegation modifications are found, legal sanctions and further action should be pursued.

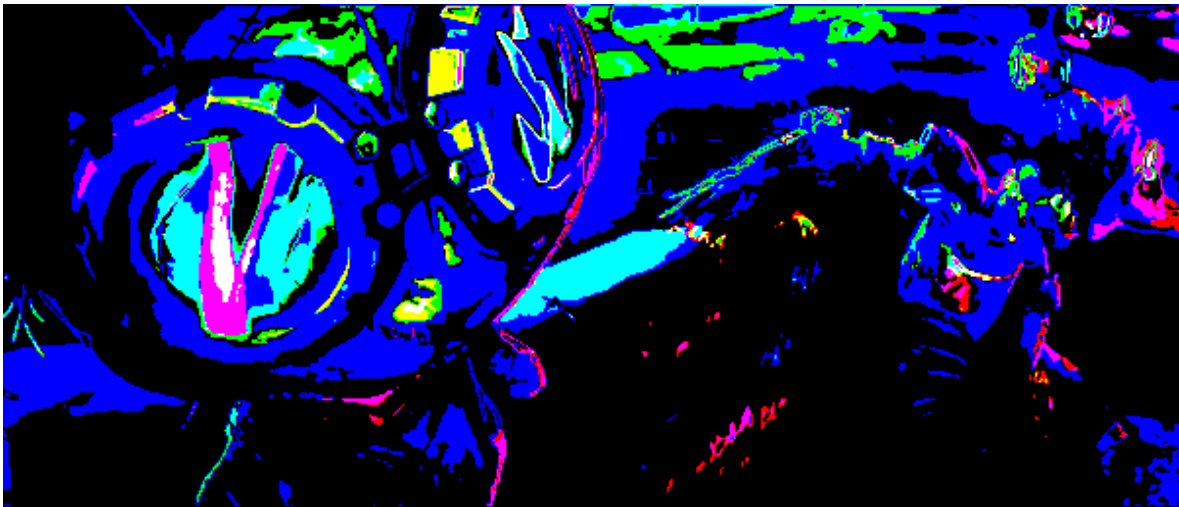
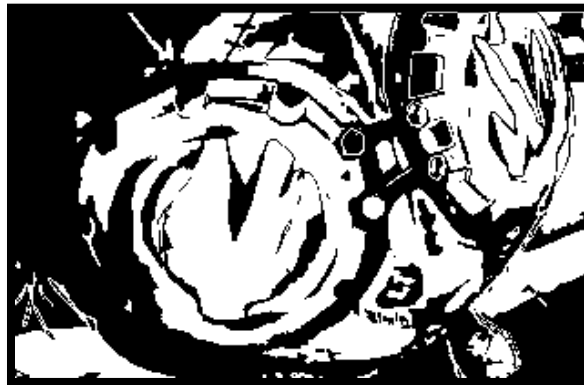
Exhibit H- M.W in the Claggor doll's goggles lens.

It is alleged that we see M.W. hidden in Arcane's visuals yet again. This time in the lenses of Claggor Doll's goggles. M in the left lens and W in the right lens. This is far beyond anything which could be construed as an accident or coincidence. The Plaintiff alleges that its direct abuse.

In the left eye lens we see two crooked but vertical cracks. Then in the middle we see a V of reflected light. This makes an M. We see it again upside down in the right lens, with two shards of glass missing from the lens marking the cut outs of a W.







Legal Argument and Conclusion for Exhibit H – M.W. in the Claggor Doll’s

Goggles Lens

Additional Evidence of M.W. Hidden in Arcane’s Visuals

It is alleged that Arcane includes another instance of M.W. hidden in its visuals, this time within Claggor Doll’s goggles. In the left lens, two crooked vertical cracks alongside a V-shaped light reflection create the letter “M”, while in the right lens, two missing shards of glass form the shape of a “W”.

This placement is far beyond coincidence and supports the Plaintiff’s assertion that Riot Games deliberately embedded references to M.W. Wolf in Arcane. The Plaintiff alleges that this is not only an acknowledgment of his work but an act of direct abuse, designed to taunt and psychologically manipulate him. The deliberate nature of these initials, combined with other instances of “M.W.” appearing throughout Arcane, reinforces the claim that Riot had direct knowledge of Bloodborg: The Harvest and attempted to subtly signal their appropriation of its elements.

1 **Conclusion**

2
3 The presence of “M.W.” in the Claggor doll’s goggles is yet another instance of
4 direct visual acknowledgment of the Plaintiff, further reinforcing the argument that Arcane
5 deliberately included hidden references to Plaintiff M.W. Wolf. The M in the left lens and W in
6 the right lens, formed by specific cracks and reflections, is too precise to be a mere coincidence.
7

8
9 Given the pattern of recurring “M.W.” initials in Arcane, which Plaintiff alleges
10 appear numerous times across the series, this cannot be dismissed as accidental. Instead, it
11 suggests a deliberate, targeted inclusion, possibly as a taunt or veiled reference to the Plaintiff’s
12 work, Bloodborg: The Harvest.
13

14
15 This supports the broader claim that Riot Games and its affiliates had knowledge
16 of Plaintiff’s work and made intentional references within Arcane. Whether as an
17 acknowledgment of inspiration or an act of misconduct, such visual insertions strongly
18 undermine Riot’s independent creation defense and further validate the Plaintiff’s allegations of
19 copyright infringement and misappropriation.
20
21
22
23
24

Legal Argument

1. Pattern of Hidden M.W. References as Evidence of Knowledge of Plaintiff's

Work

Plaintiff has identified multiple instances of “M.W.” appearing in Arcane, including within the Hexcore (Exhibit F) and other visual elements.

The Claggor doll’s goggle lenses clearly depict the letters “M” and “W” through intentional design elements, reinforcing a pattern.

Courts have recognized hidden acknowledgments of an original author within allegedly infringing works as supporting evidence of access and copying (See *Bright Tunes Music Corp. v. Harrisongs Music, Ltd.*, 420 F. Supp. 177 (S.D.N.Y. 1976)).

2. Riot’s Independent Creation Defense is Further Undermined

If Riot’s claim of independent creation were true, there would be no logical reason for Plaintiff’s initials to appear multiple times in Arcane. There are so many, that the Plaintiff has left many out of these reports because they would be too long.

1 The more instances of M.W. hidden in Arcane, the less credible Riot's denial of
2 access and copying becomes.

3
4 Under Sheldon Abend Revocable Trust v. Spielberg, 748 F. Supp. 2d 200
5 (S.D.N.Y. 2010), consistent references to a prior work within a disputed creation are strong
6 circumstantial evidence of copying.
7

8
9 *3. Riot's Inclusion of M.W. in Visuals May Constitute Intentional Misconduct*
10

11
12 Plaintiff alleges that these visual references are not just hidden acknowledgments,
13 but a form of direct abuse and psychological manipulation.
14

15 The deliberate embedding of M.W. in the Claggor doll's goggles could indicate
16 willful infringement and bad faith conduct, which may warrant additional legal consequences
17 under 17 U.S.C. § 504(c) (statutory damages for willful infringement).
18

19
20 *4. Request for Discovery and Further Investigation*
21

22
23 Plaintiff requests access to Riot's internal visual development documents and
24 concept art iterations to determine whether the placement of "M.W." was intentional.
25

Plaintiff seeks depositions of Arcane’s animators and designers to identify who made the decision to embed “M.W.” in Claggor’s goggles.

If Riot is found to have intentionally included such references despite denying knowledge of Plaintiff’s work, the Court should consider sanctions for bad-faith litigation tactics.

Final Legal Conclusion

The repeated presence of “M.W.” in Arcane, particularly in Claggor’s goggles, strongly suggests that Riot Games was aware of Plaintiff and his work. The intentional embedding of these initials cannot be dismissed as coincidence, further undermining Riot’s independent creation defense and strengthening Plaintiff’s claim that Bloodborg: The Harvest was directly referenced and used in Arcane.

If Riot’s inclusion of M.W. was intentional, this constitutes willful infringement and bad faith conduct. Plaintiff urges the Court to grant full discovery into Arcane’s visual development process and impose legal consequences if intentional misconduct is found.

Exhibit I – Generic Bunny: Ru-Bunny vs. Jinx’s Stuffed Bunny

Introduction

Even a seemingly generic stuffed bunny holds profound symbolic significance in both Bloodborg and Arcane. The Ru-bunny in Bloodborg serves as an extension of Ruby’s innocence and emotional core, while Jinx’s stuffed bunny in Arcane plays a similar role in representing her lingering attachment to Vi and her fractured psyche. While the use of a stuffed bunny may appear generic at first glance, the way it is incorporated into both narratives makes it highly specific and thematically charged.

Analysis and Comparison

Ru-Bunny in Bloodborg

In Bloodborg, Chris’s daughter Ruby has an intense emotional connection to her stuffed bunny, which becomes a symbol of both her childhood innocence and Chris’s internal struggle between duty and fatherhood. The bunny is not merely a toy- it is a representation of Ruby’s purity, comfort, and her way of coping with an unstable world.

1 Additionally, the unhealthy attachment hints at generational trauma, suggesting
2 that Ruby's bond with Ru-bunny is influenced by her father's PTSD struggles. This adds a
3 deeper psychological layer to her relationship with the bunny.
4

5
6 **Key Quotes from Bloodborg:**
7

8 1, *"The thump at the door was his daughter entering his office: six-year-old Ruby*
9 *Redgrave, Little Ru-bunny."*
10

11
12 2, *"Daddy, Daddy, pancakes for breakfast! Mummy said I can help you make*
13 *them," said Ruby running over, still in her bunny rabbit pajamas, with one pyjama leg pulled up*
14 *to the shin and dragging bob-face bunny by his ears."*
15

16
17 3, *"Chris squeezed his daughter, kissing her on the head. 'Oh, ooh pancakes, hey,*
18 *I love making pancakes with my Ru-bunny.'"*
19

20 4, *"Ru-bunny's stuffed ears flopped as Ruby squeezed it tight, like she was*
21 *shielding it from the outside world."*
22

1 The Ru-bunny serves as a living metaphor for both Ruby's childhood innocence
2 and vicarious trauma, and its presence or absence is deeply tied to emotional beats in Chris's
3 character arc.
4

5 6 **Jinx's Stuffed Bunny in Arcane**

7
8 In Arcane, Jinx's stuffed bunny serves as a constant reminder of her past, her
9 sister Vi, and the traumatic loss that shaped her. It is an object of comfort in moments of distress,
10 reflecting how she clings to fractured memories of her sister and childhood. Like Ruby's Ru-
11 bunny, Jinx's stuffed bunny is an extension of her emotional core, acting as a symbol of
12 unresolved trauma.
13

14 15 **Key Parallels to Bloodborg:**

16
17
18 Emotional Anchor: Both Jinx and Ruby cling to their stuffed animals in times of
19 distress, using them as emotional crutches to maintain a connection to the past.
20

21 Symbol of Unresolved Trauma: The Ru-bunny is tied to Ruby's experiences of
22 her father's PTSD, while Jinx's stuffed bunny represents her emotional fractures following the
23 loss of her sister Vi.
24

Loss of Innocence: Both stuffed animals symbolize a fading childhood innocence
in harsh, dystopian worlds filled with violence and conflict.

Narrative Function: Innocence as a Vulnerability

Both Bloodborg and Arcane use the stuffed bunny as a narrative device to
underscore:

The fragility of innocence in a violent, unforgiving world.

The emotional core of a character who is otherwise surrounded by conflict.

The weight of memories and how tangible objects can hold deep personal
significance.

The psychological impact of trauma and how it manifests in attachment objects.

The deep and meaningful crossover here, shows a deep analysis of Bloodborg,
and not just a facelift. It is alleged that this exhibit shows that Bloodborg had to have been not
only read but analysed with intent to have come up with the same emotional core meaning.

Legal Argument: Substantial Similarity and Derivation

The presence of a deeply symbolic stuffed bunny in both works is not a generic trope, but a specific narrative and emotional device that serves an identical function in both stories.

1. Thematic and Narrative Overlap

The Ru-bunny in Bloodborg and Jinx's stuffed bunny in Arcane serve as more than mere toys—they are pivotal emotional symbols.

Courts have recognized that highly specific character symbols, particularly those tied to trauma and emotional development, can constitute substantial similarity (See *Sheldon Abend Revocable Trust v. Spielberg*, 748 F. Supp. 2d 200 (S.D.N.Y. 2010)).

3. Riot's Access to Bloodborg

Riot Games had access to Bloodborg well before Arcane's release, and the inclusion of a thematically identical stuffed bunny strongly suggests derivation rather than independent creation.

1 Under Fisher-Price, Inc. v. Well-Made Toy Mfg. Corp., 25 F.3d 119 (2d Cir.
2 1994), modifications to a copied element do not negate infringement if the core expression
3 remains substantially similar.
4

5
6 *3. Plaintiff's Claim of Copyright Infringement*

7 The use of a stuffed bunny as a deeply symbolic object of innocence and trauma
8 in both works is highly specific.
9

10 Given Riot Games' timeline of access to Bloodborg, the Plaintiff asserts that
11 Jinx's stuffed bunny was directly built by Ru-bunny in Bloodborg.
12

13
14 If Riot's legal team continues to deny access, Plaintiff requests discovery of
15 internal development documents and writer notes to determine how and when the stuffed bunny
16 concept was implemented into Arcane.
17

18
19 **Conclusion: A Deliberate Parallel, Not Coincidence**
20

21 The concept of a stuffed bunny serving as an emotional anchor for a trauma-
22 ridden character in a dystopian world is highly specific. The parallels between Ru-bunny and
23
24

1 Jinx's stuffed bunny- both in their narrative function, emotional significance, and symbolic
2 weight- strongly suggest derivation rather than independent creation.
3

4
5 Given the clear timeline overlap, repeated patterns of similarity, and substantial
6 emotional and symbolic parallels, Plaintiff asserts that the use of Jinx's stuffed bunny in Arcane
7 is not coincidental, but a masked adaptation of the Ru-bunny from Bloodborg.
8

9
10 Plaintiff respectfully requests that the Court allow full discovery to investigate
11 Riot Games' internal development records and determine the true origins of this symbolic
12 element.

13
14 Plaintiff will note that, as of yet, halfway through episode 5 of Arcane, he has
15 shown that every major beat, character, feature and scene is adapted directly from Bloodborg,
16 less for a few scenes of Viktor and Jayce talking.
17
18
19
20
21
22
23
24

1 Images of the Bunny in Arcane. In the last image on this page you will see
2 that Jinx has crucified the Bunny (The innocence of Powder) to become Jinx.
3

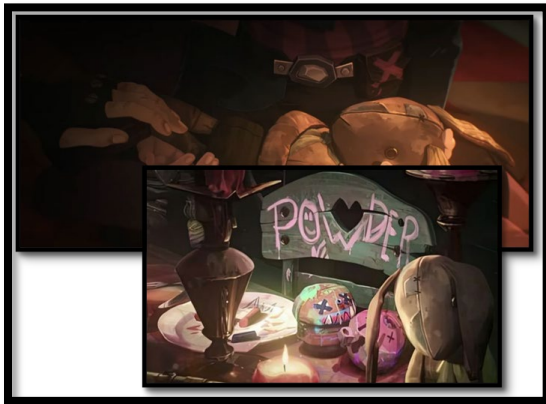


Exhibit J – Navigating Pipes, Cables, Gangways, Monorails, and Sky-Rails

In the next scene we see Vi standing at the edge of Zaun. Looking down into
maze of pipes, cables, and bolstering sleepers. We see a descending pipe and streetcar/ monorail.



In Bloodborg: The gangways, monorails, and sky-rails were built higher and
higher to escape the deathly low laying pea fog and radioactive waste fumes extracted from the
pipes of Assemblage mainland.

1 We see Vi, having essentially been locked in a cage and beaten for many
2 years, performing flying backflips down into Zaun's underworld.
3



12
13 We then see Vi's slide and roll, also a signature move of Rook in Bloodborg.
14



1 We then see Vi running down a slanted pipe towards the streets of Zaun.
2



15
16 **In Bloodbore:** *sprinting up a slanted pipe towards the streets of...*

17
18 **Later:** *we navigate these pipes to the old sky rail...*

19 **Later:** *Just one fall would mean death, as they crossed the bulky pipes and cables*
20 *from each battered...*
21
22
23
24

1 The navigation of pipes, cables, gangways, monorails, and sky-rails plays a
2 critical role in both Bloodborg and Arcane. These intricate, elevated pathways serve as more than
3 just environmental set pieces- they are an integral part of how characters traverse their dystopian
4 worlds and reflect the social and structural decay present in both narratives.
5

6
7 **In Arcane,** Vi's acrobatics through Zaun's maze of pipes and cables after years of
8 imprisonment showcases her resilience and adaptability. In Bloodborg, Rook's traversal of the
9 gangways, monorails, and sky-rails highlights the perilous conditions of New Kowloon, where
10 the need to escape toxic lowland fog and radioactive waste fumes necessitates movement
11 through elevated structures.
12

13 14 **Vi's Navigation in Arcane**

15 Standing at the Edge of Zaun: Vi surveys a sprawling maze of pipes, cables, and
16 sleepers, observing a descending pipe and streetcar/monorail, setting up her imminent descent.
17

18
19 Backflipping into Zaun's Underworld: Having been locked in a cage and beaten
20 for years, Vi executes impressive aerial maneuvers as she dives headfirst into Zaun's depths.
21

22
23 Sliding and Rolling: Vi's signature movement style includes controlled slides and
24 rolls, which allow her to quickly and fluidly traverse obstacles.
25

1
2 Sprinting Down a Slanted Pipe: Vi uses angled infrastructure to reach the streets
3 of Zaun, demonstrating agility and familiarity with navigating urban decay.
4

5 6 **Rook's Navigation in Bloodborg**

7 Sprinting Up a Slanted Pipe: In Bloodborg, Rook ascends an inclined pipe,
8 mirroring Vi's descent in Arcane, but in a context where height provides safety from the toxic
9 fog below.
10

11 Traversing the Old Sky Rail: The sky-rail system in Bloodborg is essential for
12 movement, much like Zaun's monorails.

13 Sliding and Rolling as a Survival Mechanism: Rook's movement includes precise
14 acrobatic techniques similar to Vi's, emphasizing her survivalist instincts in a perilous industrial
15 environment.
16

17 Crossing Dangerous Pipes and Cables: Bloodborg describes the treacherous
18 nature of these structures, where one fall could mean death- a concept echoed in Arcane, where
19 falling into Zaun's depths could be equally fatal.
20
21
22
23
24

1 **Narrative and Symbolic Significance**

2
3 Both Bloodborg and Arcane use these industrial landscapes as a reflection of
4 decay, danger, and survival:
5

6 The elevated structures represent escape, movement, and rebellion- whether
7 fleeing a dystopian system (Bloodborg) or breaking free from captivity (Arcane).

8 The treacherous pathways highlight the fragility of life in a collapsing world-
9 characters must adapt to these structures to survive.
10

11 Both protagonists (Rook and Vi) showcase an intimate knowledge of their
12 environment, proving their resilience and adaptability through their movement.
13

14 **Legal Argument: Substantial Similarity in Environment and Movement**

15 **Mechanics**

16
17
18 *1. Thematic and Structural Overlap*

19 The use of pipes, cables, monorails, and sky-rails as primary traversal mechanics
20 is central to both stories.

21 Courts have recognized that environmental and movement-based similarities can
22 contribute to substantial similarity claims (See Walker v. Time Life Films, Inc., 784 F.2d 44 (2d
23 Cir. 1986)).
24

1
2 *2. Riot's Access to Bloodborg*

3 Bloodborg was widely disseminated before Arcane, and the similarities in
4 movement mechanics, environmental hazards, and traversal techniques suggest direct inspiration
5 rather than coincidence.
6

7 The intricate and specific nature of these navigation methods goes beyond generic
8 tropes and into derivative expression.
9

10
11 *3. The Risk of "Masked" Infringement*

12 Riot's reframing of Rook's movement style as Vi's traversal system in Arcane is
13 a key example of how masked infringement operates—altering superficial details while keeping
14 core expressive elements intact.
15

16 Under *Fisher-Price, Inc. v. Well-Made Toy Mfg. Corp.*, 25 F.3d 119 (2d Cir.
17 1994), modifications do not negate infringement when the underlying creative expression
18 remains similar.
19
20
21
22
23
24

Conclusion: A Deliberate Structural and Environmental Parallel

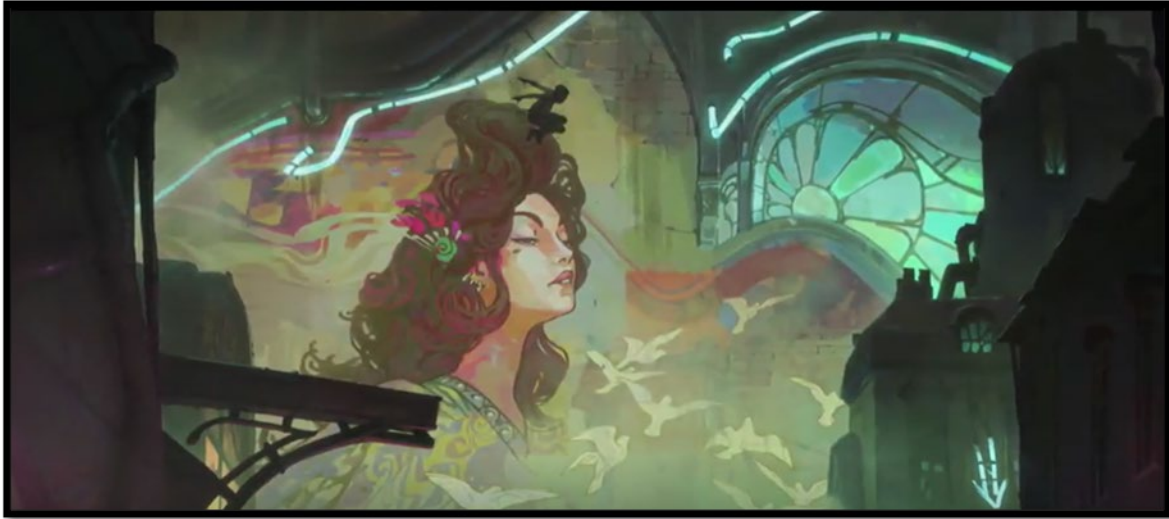
The parallel use of industrial traversal mechanics, the thematic role of elevated structures, and the acrobatic techniques of both protagonists suggests that Riot Games directly borrowed from Bloodborg in developing Arcane.

Given the clear similarities in environment, movement, and survival mechanics, Plaintiff asserts that the traversal sequences in Arcane were not independently created but derived from Bloodborg.

Plaintiff respectfully requests full discovery into Arcane's level design documents, animation reference sheets, and development notes to determine the true origins of these elements.

Exhibit K – Mural of Better Bygone Days of Fresh Air

In Bloodborg, Rook as had to disguise her identity as a young woman to protect herself, with Roy the Robot, up high in the towers above the smog, she feels free to release her true self, but she still has the conflict in her identity.



Comparison Between Arcane and Bloodborg

Both Arcane and Bloodborg use murals as a powerful visual and thematic device to evoke nostalgia, loss, and the stark contrast between past prosperity and present decay. These murals serve as silent markers of lost worlds, reinforcing the environmental degradation and socio-political oppression present in both narratives.

1 **Murals in Arcane**

2
3 As Vi descends into the smog-filled streets of Zaun, she passes a striking greenish
4 mural painted on a steel wall.
5

6
7 The mural depicts white birds (doves) soaring from lush greenery, a symbol of
8 freedom and purity amidst industrial pollution.
9

10 A woman with long, flowing dark hair is featured, with fresh wind rushing
11 through her hair, creating a dreamlike contrast to the oppressive environment of Zaun.
12

13
14 Vi jumps with her arms outstretched like a bird, visually mirroring the symbolism
15 of the mural, reinforcing the theme of longing for freedom from oppression.
16

17
18 **Murals and Symbolism in Bloodborg**

19
20 In Bloodborg, similar murals exist, acting as relics of a forgotten world, providing
21 a painful reminder of what once was and can never be again.
22

1 The murals are often accompanied by environmental decay, such as smog, steel
2 beams, and industrial wreckage, much like in Zaun.

3
4 A specific Bloodborg mural depicts a lush green park painted onto steel walls,
5 with graffiti pointing towards an uninhabitable, toxic wasteland below, which we also see in the
6 Arcane mural.
7

8
9 Birds and wind imagery are also present, reinforcing the motif of lost freedom and
10 the contrast between the past and present.
11

12
13 **Key Quotes from Bloodborg:**

14 *“As they approached an opening, looking out over empty space, an iron mesh rail*
15 *lined the walkways. A mural of a lush green park was painted onto one of the steel walls which*
16 *the railings were attached to. A graffiti sign suspended from an overhead cable said “NYC*
17 *central park this way” with a green boil infected finger pointing down over the rail into the*
18 *smog.*
19

20 *Warwick walked over to the rail, peering over the void. A network of wires and*
21 *rods spread into the darkness ahead and into the smog below. Massive steel bolstering beams*
22 *rose from the darkness, pushing against the giant towers.*
23

1 *'I wonder what it was like down there in Central Park before the fall,' said Jade*
2 *standing next to Warwick and placing her hand next to his on the rail.'*"
3

4
5 **Character Parallels: Vi vs. Rook**
6

7 Beyond just the murals, the characters of Vi (Arcane) and Rook (Bloodborg)
8 embody the same visual and thematic imagery in their physical movements and emotional
9 connection to lost freedoms:
10

11
12 Vi's Descent into Zaun mirrors Rook's symbolic release in Bloodborg.
13

14 Vi spreading her arms like a bird while jumping off a ledge parallels Rook's
15 expression of freedom when she removes her disguise.
16

17
18 Both moments occur in a space of hidden truth- Vi moves through a mural
19 depicting freedom, while Rook sheds her disguise high above the smog, embracing her true self.
20

21 **Key Quotes from Bloodborg:**
22

23 *"Rook pulled off her wig cap releasing a torrent of glossy black. The long black*
24 *hair sprung down to the rags bound around her chest. Rook sighed as she slowly unwrapped her*
25

1 torso. She stood on the window ceil and stretched out her arms, like a dove released. The air
2 tickled the tiny hairs on her forearms as she waved them around.

3 ‘Oh, the sensation of the air, gliding against my skin,’ she said pronouncing her
4 S’s and raising the pitch of her voice. She had perfected her low, monotone masculine voice but
5 it never felt like home. Alone with Roy, her masked disintegrated.
6

7 She jumped down from the ceil, waving her hair around and running her fingers
8 through it.

9 ‘Free as a bird,’ said Roy”
10
11

12 **Conclusion: A Deliberate Visual and Thematic Parallel**

13
14 The imagery of murals representing lost natural beauty and freedom, paired with
15 character-driven symbolic gestures, is highly specific and deliberate:
16

17
18 The striking similarity in mural composition, lighting, and framing in both Arcane
19 and Bloodborg is unlikely to be coincidental. Moreover, the scene of Rook’s flowing hair and
20 feeling as free as a dove, is literally painted on the wall.
21

22 Bird imagery, flowing hair, and wind symbolism all function identically in both
23 stories as representations of fleeting freedom and personal liberation.
24

1
2 The narrative beats of Vi's and Rook's movement through these spaces further
3 reinforce thematic overlap, strengthening the argument for derivation rather than independent
4 creation.
5

6 **Legal Argument: Substantial Similarity and Access**
7

8 *1. Visual and Narrative Symbolism as Protectable Expression*
9

10 Courts have recognized that highly specific visual storytelling elements, when
11 integrated into a narrative, can be protected under copyright law (See *Sheldon v. Metro-Goldwyn*
12 *Pictures Corp.*, 81 F.2d 49 (2d Cir. 1936)).
13
14

15 The use of murals in dystopian landscapes as nostalgic devices is not merely an
16 idea, but an expressive execution of that idea, making it copyrightable.
17
18

19 *2. Riot's Access to Bloodborg*
20

21 Bloodborg was widely circulated before Arcane's production.
22
23
24
25

1 The clear structural, thematic, and symbolic parallels between these murals and
2 visual storytelling strongly suggest derivation rather than independent creation.

3
4
5 *3. Pattern of Masked Infringement*
6

7 Riot Games has previously altered minor details while retaining the core
8 expression of borrowed elements (See *Fisher-Price, Inc. v. Well-Made Toy Mfg. Corp.*, 25 F.3d
9 119 (2d Cir. 1994)).
10

11
12 Minor stylistic changes do not negate copyright infringement when the underlying
13 visual and narrative storytelling remains the same.
14
15
16
17
18
19
20
21
22
23
24

1 **Final Request for Discovery**

2
3 Given the thematic and symbolic overlaps, Plaintiff requests:

4
5
6 Full discovery into Riot Games' visual development process, including mural
7 inspirations and early concepts.

8
9 Internal emails or design documents detailing the use of murals in Arcane.

10
11
12 Comparisons of early Arcane storyboards with Bloodborg references to determine
13 whether these elements were sourced from Plaintiff's work.

14
15 **Conclusion:** The mural parallels in Arcane and Bloodborg are too specific to be
16 coincidental. The composition, symbolism, and character-driven interaction with these murals
17 indicate that Arcane borrowed heavily from Bloodborg. Plaintiff seeks further investigation into
18 Riot Games' design process to determine the full extent of this derivation.
19

**Exhibit L - Viktor's Vision vs. Bloodborg's Higher Consciousness and
Forced Evolution**

In Arcane, Episode 5 of Season 1 presents a defining moment in Viktor's character arc. Jayce asks Viktor about "the vision he received from the Arcane," referring to their research into Hextech and its mystical properties. Viktor responds: "What if we've been looking at it backwards?" He states that the Arcane speaks through the runes. This moment signifies a fundamental shift in his understanding of Hextech, it is no longer just a tool but something that must be nurtured and organically evolved, rather than artificially controlled.



This aligns strongly with the transformation narratives in Bloodborg: The Harvest, where higher consciousness, bio-mechanical augmentation, blood-based drugs and engineering and forced evolution play a central role.

Parallels in Bloodborg - The Higher Consciousness and Forced Evolution:

1. Viktor's Vision and the Arcane's Higher Consciousness

In Arcane, Viktor's blood spills onto the Hexcore, causing it to react and "communicate" with him. This marks the beginning of his transformation, merging his biology with the mystical Hextech, ultimately shifting him from a sickly scientist to something beyond human (A bloodborg by the end of season 2).

In Bloodborg, the Founding Families control forced evolution through biological augmentation, much like how the Arcane in Arcane controls Viktor's transformation.

The higher consciousness is hijacked and manipulated by power-hungry elites, much like Viktor's shift from an independent scientist to an Arcane puppet.

Key Quotes from Bloodborg:

"Neva searched the higher consciousness day and night for Sabella's aura. 'She's not in Gaia,' Neva wailed, 'I've searched everywhere.'"

This highlights the existence of a "higher plane" in Bloodborg, similar to the Arcane's higher energy system that Viktor connects with.

Viktor visits the higher consciousness and hijacks the higher energy, becoming a Jesus-like savior. With his new powers, he hijacks and controls the minds of his followers, turning them into White-eyed followers in the same way as Vada In-brain does to its connected subjects.

This directly mirrors how Viktor's transformation in Arcane shifts him into a messianic figure, as he "saves" the downtrodden but also manipulates and radicalizes them.

"When Sant'teon returned, he medicated Gaia. He also observed that not all humans were bad, some were trying to reconnect with the higher consciousness, some were trying to heal the earth. He spoke the Four Ordinances to the Founding Families, mediating the symbiotic relationship. He told, if we could not transition back to being communalistic, both the blue planet and humans would perish."

'What are the Four Ordinances?'

'First, Sant'teon instructed the Founding Families to "gather the people". And so, they came, from all over the world people came to the Ark. Once the gene pool was replenished and teeming with variance, he spoke the second instruction, "Build a defensive wall". And so, the Founding Families had the wall built and since that day, the wall has been defended. Sant'teon then instructed the Founding Families to "Build an Ark by fortifying the chosen lands". And so, they did. And since then the damned have tried to destroy it, to corrupt the final vessel of the Archon. Finally, Sant'teon instructed the Founding Families to "Defend

1 *the Ark at all costs and fill it no more”. If the Nullifidian infest the Ark, Gaia will self-mutilate*
2 *until her body and soul are uninhabitable. And so, since that day, we Defenders have defended*
3 *the Ark. It shall remain defended until the final cull is over.’”*
4

5 *This mirrors Viktor’s role in Arcane, where his “sacrifice” and bodily*
6 *transformation become tools of control for those manipulating Hextech.*
7

8 **2. Transformation through Blood and Hextech**

9 **In Arcane**, Viktor’s biological transformation is driven by the Hexcore reacting
10 to his blood. Over time, the Hexcore becomes both a source of power and a trap, controlling his
11 fate and pushing him into a cult-like figure.
12

13 **Parallels in Bloodborg - Blood-Driven Augmentation**

14
15
16 **In Bloodborg**, blood plays a pivotal role in the augmentation process:
17

18
19 *“If you haven’t been infected or mutated, your blood is valuable to them, at*
20 *differing prices, depending on your blood type and genetic indicators.”*
21

22 *“The Founding Families are moving towards a world without resistance, a one-*
23 *world slave machine where the only survivors see them as gods. They plan to re-house their*
24 *minds in Bloodborgs, the pinnacle of all creation.”*
25

1 This demonstrates the dystopian theme of controlled human transformation via
2 blood engineering, just like how Viktor loses control over his own humanity in Arcane.

3
4 In both stories, biological sacrifice is necessary to "ascend" to the next stage of
5 evolution. Viktor's vision isn't just a scientific breakthrough- it's a surrender of his agency, just
6 as the Bloodborg victims are stripped of theirs.
7

8 9 **4. The Cult of Evolution - Viktor's Followers vs. Bloodborg's Indoctrinated**

10

11
12 As Viktor's transformation progresses, he begins influencing others, attracting
13 followers who seek his guidance. His blood-fueled evolution creates a godlike presence, turning
14 him into a savior figure for the downtrodden.
15

16 17 **Parallels in Bloodborg - White-Eyed Followers and Radicalized Devotion:**

18

19 Viktor begins redeeming those addicted to Shimmer, forming a cult-like
20 following. With this symbiosis, Viktor's mind expands, allowing him to telepathically connect
21 with his followers and even control their thoughts. These followers become his Bloodborg
22 Robots; cybernetic beings bound to his will.
23
24

1 This mirrors the concept of the Bloodborgs, who are similarly transformed into
2 mind-controlled beings, losing their free will and becoming puppets of an overarching system.

3
4
5 **4. Legal Argument - Copying Beyond Generic Tropes**

6 The striking thematic, narrative, and symbolic parallels between Viktor's
7 transformation and the Bloodborg forced evolution suggest direct influence rather than
8 coincidence. Courts have historically recognized that even when certain sci-fi tropes are
9 common, the unique execution of those tropes matters. Yet, Bloodborgs are not tropes, they are a
10 copyrighted concept of The M.W. Wolf Bloodborg series, owned exclusively by the Plaintiff in
11 these matters.
12

13
14 Legal Precedents Supporting Plaintiff's Argument:
15

16
17 Bright Tunes Music Corp. v. Harrisongs Music, Ltd., 420 F. Supp. 177 (S.D.N.Y.
18 1976) – Courts acknowledged subconscious copying as a form of infringement when similarities
19 were too significant to be coincidental.

20 Sheldon v. Metro-Goldwyn Pictures Corp., 81 F.2d 49 (2d Cir. 1936) – The court
21 ruled that substantial similarities in plot structure, themes, and character arcs can indicate
22 unlawful appropriation.
23

1 Universal City Studios, Inc. v. Film Ventures Int'l, Inc., 543 F. Supp. 1134 (C.D.
2 Cal. 1982) - A film was found to infringe another work despite having a different setting because
3 the narrative progression and visual storytelling were nearly identical.
4

5
6 The above cases reinforce that:
7

8 The complex and specific use of forced evolution, blood augmentation, and
9 higher consciousness transformation in Bloodborg cannot be dismissed as generic.
10

11 Arcane's portrayal of Viktor's forced transformation, blood sacrifice, and his
12 followers is too structurally and thematically similar to Bloodborg to be considered independent
13 creation. In Season 2, both Viktor and Warwick become bloodborgs.
14

15 Riot Games' attempts to claim independent creation would be a disingenuous
16 delay tactic, given the overwhelming similarities and direct use of a copyrighted exclusive
17 concept never used before.
18

19
20 **5. Conclusion: The Pattern is Clear**

21 The blood-driven transformation of Viktor, his loss of agency, his role as a forced
22 savior, and his connection to an external "higher power" directly parallel the themes in
23 Bloodborg. These are not common sci-fi tropes in isolation, but rather a highly specific and
24

1 interwoven combination of ideas that Riot Games could only have arrived at through access to
2 Bloodborg. Independent creation isn't possible, as the Plaintiff owns the exclusive rights to the
3 concept of Bloodborgs.
4

5
6 Thus, Viktor's Vision and transformation into a pseudo-messianic Bloodborg-like
7 figure supports the Plaintiff's argument that Riot Games used substantial elements from
8 Bloodborg in Arcane.
9

10
11 Plaintiff asserts that Riot's continued denials and delay tactics are legally unsound
12 and should be considered a harmful obstruction. Further, if proven to be deliberate, these actions
13 may constitute willful copyright infringement and bad-faith litigation conduct.
14
15
16
17
18
19
20
21
22
23
24

Exhibit M- Eating toxic slugs and other bugs.

In Bloodborg's New Kowloon food is scarce. People eat whatever they can catch or collect or salvage, including radioactive slugs, bugs, insects, rats, cats, dogs, birds, eat creatures, worms, and even an orange fungus and algae, which has a major plot beat in book 2. Their stomach acids have changed as a result of such unsavoury diets.

Examples from Bloodborg:

1, "The odour of fried insects smothered the apartment."

2, "... wolfed down a bowl of mixed fried insects and worms."

3, "... with tanks and cages and nets full of different insects and bugs."

3, "A young boy ran over to her, from his belt, he pulled out a hunting dagger.

With the blade he scraped off the slug she had just squashed. He placed the slug into an old jam jar containing several other tiny creatures, he screwed the lid back on the jar.

'Mama make sure you wash your hand before you eat, these slugs carry all kinds of germs and stuff, could kill ya,' said the young boy before running off."

1 In the below images from Arcane Episode 5, we see Vi sat with Caitlyn at a food
2 counter. She's wolfing down a sloppy blue and orange slug.

3 Whilst perhaps not the most unique concept or trope, the parallels can not be
4 ignored. Standalone its coincidence, added to the thousands of other strikingly similar parallels
5 and we are seeing a clear pattern of methodical copyright infringement, far beyond anything
6 which could be perceived as coincidence or even subconscious borrowing. We are seeing a
7 planned and orchestrated adaptation of Bloodborg with deliberate masking.
8



26 114

27 PLAINTIFF'S DETAILED BREAKDOWN AND ANALYSIS OF GASLIGHTING OF EPISODE 5:

28 SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

Conclusion for Exhibit M - Eating Toxic Slugs and Other Bugs

While the consumption of unconventional food sources is a recurring theme in dystopian and survival fiction, the specific execution of this concept in Arcane and Bloodborg is too detailed and aligned to be dismissed as a mere coincidence.

In both narratives, the protagonists consume mutated, potentially hazardous creatures as a reflection of their harsh environments and desperate survival tactics. However, the key distinguishing factors that separate this from a general trope are:

The Specific Use of Mutated or Toxic Slugs/Bugs - Bloodborg establishes the consumption of radioactive slugs, insects, and an orange fungus/algae as a defining dietary adaptation of the underclass, with long-term physiological effects. In Arcane, Vi eats an unnatural blue-and-orange slug, depicted with emphasis on its slimy, unsavory texture, reinforcing the grotesque survivalist theme.

The Socioeconomic Context - In both works, class disparity plays a role in forcing characters to consume these creatures. Bloodborg presents food scarcity in New Kowloon as a result of post-apocalyptic degradation, while Arcane highlights the contrast between Piltover's wealth and Zaun's squalor through Vi's meal.

Direct Parallels in Presentation- The visual and narrative beats align remarkably. The sloppy, grotesque consumption of food in a dystopian setting, the distaste of an outsider

(Caitlyn/ Jade), and the role of these creatures in a larger survivalist theme all appear in both works.

Legal Argument - A Deliberate Pattern of Adaptation

In copyright law, similarity in broad themes is not sufficient for infringement claims. However, when highly specific elements are replicated in conjunction with a pattern of other instances, it suggests deliberate copying rather than independent creation (*Sid & Marty Krofft Television Productions, Inc. v. McDonald's Corp.*, 562 F.2d 1157 (9th Cir. 1977)).

The accumulation of numerous detailed narrative and visual similarities between Bloodborg and Arcane strengthens the Plaintiff's case. Courts have ruled that "striking similarity" can be evidence of access and copying, especially when combined with a history of solicitation or prior access to the Plaintiff's work (*Three Boys Music Corp. v. Bolton*, 212 F.3d 477 (9th Cir. 2000)).

The deliberate masking of elements- such as changing Bloodborg's radioactive slugs to Arcane's mutated slugs- suggests a pattern of misappropriation with enough modifications to attempt to obscure infringement (*Sheldon v. Metro-Goldwyn Pictures Corp.*, 81 F.2d 49 (2d Cir. 1936)).

Final Statement

Taken individually, the concept of eating toxic slugs and bugs may not indicate direct copying. However, within the larger pattern of adaptations and similarities between Bloodborg and Arcane, it becomes part of a consistent and methodical effort to disguise the original source material. The volume of near-identical narrative beats, thematic executions, and worldbuilding elements overwhelmingly supports the claim that Arcane systematically appropriated Bloodborg's content while attempting to mask its origins.

Exhibit N- Arcade M.W

We see a scene in the theatre, Jayce and Mel chat whilst a man plays the violin.

There is so much M.W. iconography in the theatre that at this point, with hundreds of examples documented, why bother pointing them all out?

However, the below images are from the next scene in the Arcade. I pointed this one out because it's not just designed into the background environment, it's brought to the front of the shot, hiding in plain sight, very not clever.



118

PLAINTIFF'S DETAILED BREAKDOWN AND ANALYSIS OF GASLIGHTING OF EPISODE 5:

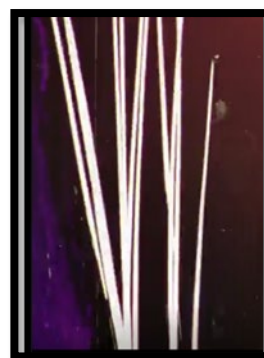
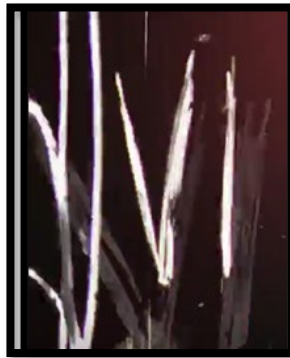
SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

Exhibit O- Jinx Fight Practice Scene M.W

We see a scene in which Jinx fixes the old fight practice machine and fires it up. Again we see M.W. iconography everywhere. There is so much of it throughout Arcane that one can only come to the conclusion that it is deliberate gaslighting to build plausible deniability into the show and to avoid litigations. It is alleged that this is direct abuse and crosses the line into criminal complaints.



1 It's not a coincidence that the trauma brake happens to morph into the initials of
2 the Plaintiff which also happen to be his writing alias, and these two letters appear over and over
3 throughout Arcane hundreds of times.

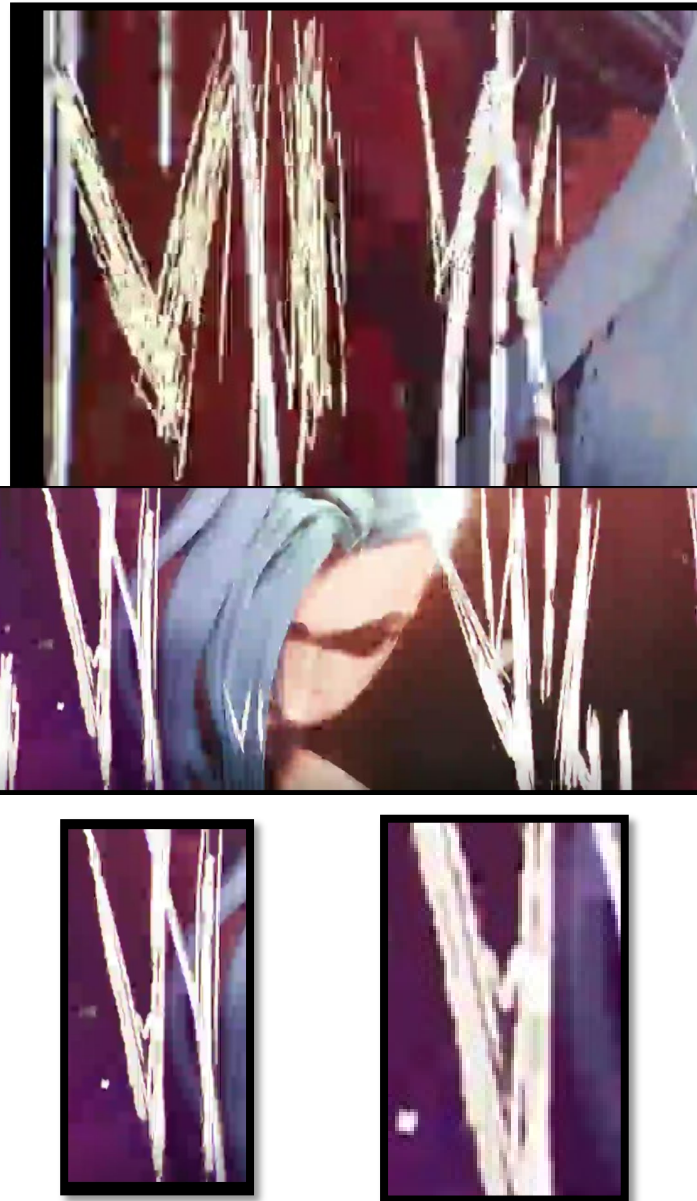


25 120

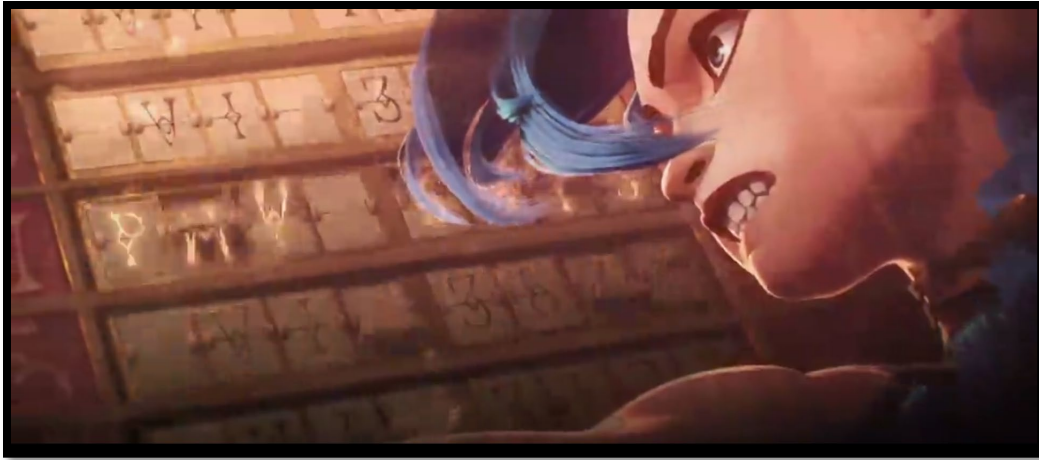
26 PLAINTIFF'S DETAILED BREAKDOWN AND ANALYSIS OF GASLIGHTING OF EPISODE 5:

27 SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE
28

Last two images on this page has an M deliberately drawn into the W.



We see M.W again on the score board.



Conclusion for Exhibit O – Jinx Fight Practice Scene and M.W. Iconography

The presence of M.W. iconography throughout Arcane, particularly in key Jinx-centric scenes, cannot be reasonably dismissed as coincidence when examined in the context of the broader pattern of alleged appropriation. The Jinx fight practice scene, featuring M.W. embedded in the visuals, aligns with numerous other instances where M.W. appears in Arcane’s production design, suggesting an intentional reference rather than an incidental occurrence.

Key Legal and Psychological Considerations

1. Gaslighting and Plausible Deniability in Media

The Plaintiff asserts that the placement of M.W. throughout Arcane is not just a passive reference but a deliberate psychological tactic intended to gaslight the Plaintiff.

Courts recognize that patterns of subtle, repeated references in media- when aligned with a larger context of misappropriation- can amount to intentional psychological harm and defamation (Doe v. Gangland Prods., Inc., 730 F.3d 946 (9th Cir. 2013)).

This method of layering plausible deniability into the infringement- where Riot Games could later claim “coincidence” while deliberately leaving breadcrumbs of targeted iconography- may constitute bad faith and malicious intent.

1 2. *Crossing into Criminal Harassment*

2
3 If Arcane’s use of M.W. is found to be deliberate targeting of the Plaintiff, it
4 could rise beyond mere copyright infringement and cross into criminal complaints under laws
5 governing harassment, intimidation, and psychological abuse.
6

7
8 18 U.S. Code § 2261A prohibits stalking and harassment, including conduct that
9 places a person in reasonable fear of harm or is intended to cause substantial emotional distress.
10 If Riot Games knowingly inserted these personalized references to mock or harm the Plaintiff,
11 this could establish grounds for criminal investigation.
12

13
14 Similar cases have ruled that intentional, repeated psychological targeting through
15 media qualifies as harassment, especially when there is a clear record of prior disputes between
16 the involved parties (U.S. v. Osinger, 753 F.3d 939 (9th Cir. 2014)).
17
18
19
20
21
22
23
24
25

Legal Argument - The Pattern of Intentional Insertion of M.W.

Courts have ruled that repeated, deliberate references to an individual- particularly in a manner that harms or ridicules them- can support claims of willful intent and bad faith (Rice v. Fox Broadcasting Co., 330 F.3d 1170 (9th Cir. 2003)).

Given that M.W. iconography appears consistently throughout Arcane, in multiple locations and key scenes, this strengthens the plausibility that it is not accidental.

The accumulation of deliberate nods, especially in a work alleged to have misappropriated Plaintiff's copyrighted material and personal trauma, suggests not only copying but intentional provocation- which could have legal consequences beyond civil copyright claims.

Final Conclusion

The repeated use of M.W. iconography in Arcane, particularly within scenes directly related to Jinx and the central conflict, cannot be explained away as a mere coincidence. When examined in conjunction with the broader pattern of misappropriation, it suggests an intentional strategy to gaslight, provoke, and create plausible deniability.

Given the psychological and emotional harm inflicted upon the Plaintiff, this matter may require further legal exploration beyond copyright law, into claims of intentional infliction of emotional distress and criminal harassment. Plaintiff reserves the right to escalate this matter should additional evidence substantiate deliberate targeting by Riot Games.

Exhibit P- Brothel/Sex Club Scene

Next we see Vi and Caitlyn visiting a sex club or brothel in Zaun.

1, They knock the door.

2, the door is opened, they stand gazing down a long corridor with red draping curtains.

3, They walk past many sex and drug booths.

4, they pass one of those little Heimerdinger like creatures in a gimp suit.

5, Vi tells Caitlyn to gain information, she should give people what they want, by letting them think she works there, because she is hot.

6, We see a ghost mask guy or girl walk by them.

7, Vi walks into the madam of the brothel's office, she is a female Heimerdinger Yordle creature. Behind her desk on the wall are many white masks.

8, Vi is sat on a sofa, behind her we see a painting of a mask sex party.

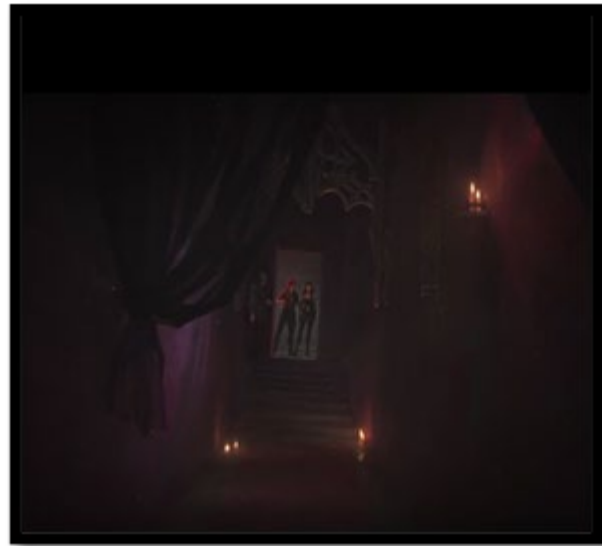
9, On the painting we see M.W.... again.

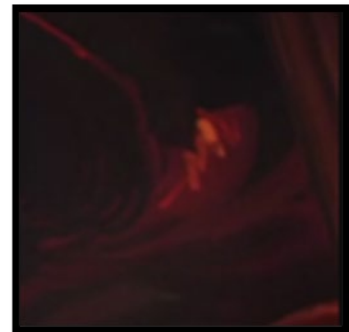
10, Vi then walks back past the booths and hears Caitlyn giggling with a half-naked woman. Vi looks in on them with envy.

1 **In Bloodborg**, D’borg is looking for Warwick. She enters a sex club/ party. She
2 sees draping fabric curtains and divided booths. She walks past the booths looking in on the
3 people with envy. She bumps into a man wearing a white ghost mask.
4

5
6 **Quote from Bloodborg**, “D’borg walked around the smog-filled rooms, which
7 were divided by wooden rails and draping fabrics.

8 She scanned the entire building looking for Warwick, who wasn’t there. She
9 passed a row of curtained-off booths. She walked the line staring into each of the booths. She
10 watched with envy as people pleased each other. A man dressed as a ghost brushed past her,
11 pressing himself against her bottom. He winked.”
12





128

PLAINTIFF'S DETAILED BREAKDOWN AND ANALYSIS OF GASLIGHTING OF EPISODE 5:

SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

Conclusion for Exhibit P – Brothel/Sex Club Scene: Arcane vs. Bloodborg

The brothel/sex club scene in Arcane bears significant similarities to the parallel scene in Bloodborg, following the same structural sequence and key narrative beats, including:

Entering the establishment through a guarded door or entrance

Long corridors lined with red draping fabric and divided booths

Passing by masked patrons and observing intimate activities with a sense of emotional detachment or envy

Encountering a ghost-masked figure

The presence of power dynamics between the characters seeking information and the figures who control the establishment

These elements are not generic tropes but specific details that suggest a deliberate adaptation rather than incidental similarity. The white masks, ghost-masked figure, and sense of voyeuristic envy align almost identically between both works, with Arcane inserting M.W. iconography in the scene, further suggesting a direct and intentional reference to the Plaintiff.

Legal Argument - Substantial Similarity & Intentional Misappropriation

1. The Scene's Structural and Narrative Similarities Strengthen a Copyright Claim

Substantial similarity in copyright law focuses on whether the total concept and feel of a work is too close to the original to be coincidental (Sid & Marty Krofft Television Prods., Inc. v. McDonald's Corp., 562 F.2d 1157 (9th Cir. 1977)).

Courts analyze whether a work reproduces key elements of protected expression rather than generic themes. The specificity of the brothel's layout, the ghost mask figure, voyeurism, and power-play dialogue suggests a substantial similarity beyond a general trope.

2. The Presence of M.W. Strengthens the Argument for Willful Infringement

The repeated presence of M.W. throughout Arcane, including in this scene, implies direct knowledge of Bloodborg and its author.

Courts have held that hidden references to the original creator within an allegedly infringing work can support claims of intentional copying (Bright Tunes Music Corp. v. Harrisongs Music, Ltd., 420 F. Supp. 177 (S.D.N.Y. 1976)).

1 3. Intentional Masking as a Delay Tactic and Legal Manipulation

2 If Arcane altered only minor details (e.g., changing the protagonist from D'Borg
3 to Vi, adding Yordles instead of humans, etc.), this suggests deliberate masking rather than
4 independent creation.
5

6 Courts have recognized that modifying minor aesthetic elements while retaining
7 core copyrighted material does not excuse infringement (Sheldon v. Metro-Goldwyn Pictures
8 Corp., 81 F.2d 49 (2d Cir. 1936)).
9

10
11 **Final Conclusion**

12 The brothel/sex club scene in Arcane aligns too closely in narrative structure,
13 imagery, and specific interactions with Bloodborg to be considered independent creation. The
14 presence of M.W. in the scene further strengthens the argument that Riot Games deliberately
15 referenced and misappropriated the Plaintiff's work. Given the broader pattern of systematic
16 similarities between Arcane and Bloodborg, this scene further supports the plaintiff's allegations
17 of methodical copyright infringement and bad-faith adaptation.
18
19
20
21
22
23
24
25

Exhibit Q- Map of Piltover on Silco's Desk

In Episode 5 of Arcane, we see a map of Piltover on Silco's desk. Still water hold is on the map.



The Plaintiff did not cover it in Episode 4, but the map is shown in Episode 4, we first see this map of Piltover on Silco's desk during a scene where he, Sevika, and Jinx are present. On the E4 map, Stillwater Hold does not feature on it. This again supports the claim that the plot point of Vi going to prison in Stillwater Hold was developed after mid-2020, when the new map was adapted, and episode 5 was being written by Overton.



Conclusion for Exhibit Q – Map of Piltover on Silco’s Desk

The evolution of the Piltover map in Arcane, particularly the absence of Stillwater Hold in Episode 4 and its sudden inclusion in Episode 5, is significant evidence supporting the claim that the prison plotline was developed late into production- after mid-2020. This directly contradicts Riot Games’ assertions that Arcane’s story was already fully developed before this period.

This timeline discrepancy raises serious questions regarding the origin of Stillwater Hold and whether its inclusion was influenced by Bloodborg after Riot Games had access to the Plaintiff’s work. The sudden narrative shift, along with the map’s revision, suggests retroactive adaptation, meaning the prison storyline may not have been part of Arcane’s original vision but was instead a late-stage addition inspired by external sources.

The key legal implication here is that if Stillwater Hold and related plot points did not exist in Riot’s early drafts and were added post-2020, this further dismantles Riot’s independent creation defense and strengthens the Plaintiff’s case that Bloodborg directly influenced Arcane’s development. Late-stage modifications and evolving world-building elements align too closely with elements from Bloodborg, reinforcing the claim of deliberate incorporation rather than independent innovation. The Plaintiff maintains that these inconsistencies, when viewed alongside the numerous other parallels between Bloodborg and Arcane, provide compelling evidence of copyright infringement, misappropriation, and bad-faith adaptation.

Exhibit R- Cyberpunk Bionic Arms

In this episode 5 scene, featuring the imagine dragons playing their enemy song, we see a band member, thought to be bassist Ben McKee. Hanging on a sale or production line behind him are Bionic Arms.

Bionic (Robotic) Arms are a stable feature of the Cyberpunk genre of science fiction and Sci Fi/ fantasy, of which Bloodborg was written in. They have no efficacy nor integrity in a steampunk world without any steam.

Of course Arcane's "Creators" can say that they were just subverting tropes, but if so, why claim that Arcane is steampunk? Of which both "Showrunners" have claimed. And it's funny how the "Subverted tropes" all appear to have been lifted from those present in Bloodborg. Moreover, why not subvert tropes that make sense, and have reason to be in the setting?

The Plaintiff puts it to Riot that the real reason that Cyberpunk tropes and aesthetics are rampant in Arcane is because it was adapted from Bloodborg, a cyberpunk book, and rushed through production.

Thus, by extension, The Imagine Dragons x J.I.D - Enemy music video (from the series Arcane League of Legends), co-produced by Riot and Fortiche Production, to promote Arcane, is also copyright infringement as almost all of Arcane is derived from the Plaintiff's copyrighted work.

Conclusion & Legal Argument for Exhibit R - Cyberpunk Bionic Arms

The presence of bionic arms in Arcane is an incongruent anomaly within its allegedly steampunk setting, as steampunk is not synonymous with cyberpunk. Cybernetic augmentations, bionic limbs, and neural enhancements belong to cyberpunk worlds- defined by high-tech, low-life dystopian societies. In contrast, steampunk relies on mechanical, steam-driven technology rather than advanced cybernetic augmentation.

Despite Riot Games and Arcane's showrunners continuously marketing Arcane as a steampunk narrative, the presence of cybernetic augmentation- a central motif in the cyberpunk genre- suggests that Arcane borrowed these elements from a cyberpunk source. Bloodborg, which is firmly cyberpunk in setting and execution, prominently features bionic arms, cybernetic prosthetics, and transhumanist enhancements as key thematic and aesthetic components.

Intentional Misrepresentation & Copyright Infringement

Arcane's showrunners could attempt to justify the inclusion of cybernetic augmentations under the guise of "subverting expectations." However:

If Arcane is truly steampunk, cybernetics have no logical place in its world.

If cybernetic technology is widely featured, Arcane is no longer steampunk but cyberpunk.

1 If Arcane's cyberpunk elements align with Bloodborg's specific themes, it
2 strongly suggests direct appropriation.

3 Riot Games cannot have it both ways. If they claim Arcane is steampunk, then the
4 inclusion of bionic arms and cybernetics makes no sense unless borrowed from a cyberpunk
5 work like Bloodborg. If Arcane is actually cyberpunk in aesthetic and narrative, then its
6 marketing, worldbuilding, and narrative framing have been misrepresented, reinforcing the
7 Plaintiff's allegation that Arcane is a derivative work of Bloodborg.
8

9 10 11 Connection to Copyright Infringement

12 Given that Arcane's cyberpunk motifs do not fit its claimed steampunk setting,
13 and that Bloodborg prominently features cybernetic enhancements, the presence of bionic arms
14 in Arcane further strengthens the Plaintiff's claim of substantial similarity.
15

16 Additionally, the music video "Imagine Dragons x J.I.D - Enemy," produced by
17 Riot Games and Fortiche, further integrates cyberpunk aesthetics. Because this video was created
18 specifically to promote Arcane, and Arcane itself is alleged to be an adaptation of Bloodborg, the
19 Plaintiff argues that this music video also constitutes copyright infringement as it visually
20 reinforces themes and aesthetics allegedly taken from Bloodborg.
21
22
23
24
25

1 This constitutes continued unjust enrichment from derivative works, which are
2 equally actionable under copyright law (see 17 U.S.C. § 106 - exclusive rights include the right
3 to create derivative works).

4
5
6 Legal Precedents Supporting Plaintiff's Position

7 Sheldon v. Metro-Goldwyn Pictures Corp., 81 F.2d 49 (2d Cir. 1936)

8
9 Established that substantial similarities in theme and execution between works
10 support inference of copying.

11
12 Fisher v. Dees, 794 F.2d 432 (9th Cir. 1986)

13
14 Clarified that misrepresentation of genre or style does not excuse substantial
15 copying when elements are recognizably derivative.

16
17 Bright Tunes Music Corp. v. Harrisongs Music, Ltd., 420 F. Supp. 177 (S.D.N.Y.
18 1976)

19
20 Stated that even subconscious copying constitutes copyright infringement if
21 similarities exist beyond coincidence.

22
23 Rogers v. Koons, 960 F.2d 301 (2d Cir. 1992)

1 Held that taking distinctive elements from an original work and repurposing them
2 into derivative media still constitutes infringement even if some details are altered.
3

4
5 **Conclusion**

6 The inclusion of cyberpunk elements in Arcane directly contradicts its purported
7 steampunk setting, reinforcing the Plaintiff's argument that Arcane was derived from Bloodborg
8 and that Riot Games deliberately incorporated Bloodborg's cyberpunk elements while falsely
9 marketing Arcane as steampunk.
10

11
12 Furthermore, the Imagine Dragons x J.I.D. - Enemy music video, co-produced by
13 Riot Games and Fortiche, further propagates copyrighted themes and aesthetics allegedly taken
14 from Bloodborg, making it an infringing derivative work.
15

16
17 The Plaintiff asserts that Arcane's cyberpunk aesthetics and themes are not
18 coincidental but deliberate misappropriation, and as such, this constitutes direct copyright
19 infringement. The Plaintiff reserves the right to seek damages for derivative works under 17
20 U.S.C. § 106 and relevant case law.
21
22
23
24
25

Exhibit S- Sevika's Bionic Arm, and fight between Vi and Sevika

In the next episode 5 scene we first see Sevika's Bionic Arm.

Sevika, Silco's right-hand partisan, wields a powerful bionic arm, a Shimmer-infused mechanical prosthetic that enhances her strength and combat abilities. This arm plays a significant role in symbolizing her allegiance to Silco and the power of Zaun's underground tech.

In appearance, this bionic limb is closer aligned with a mechanical look and not a robotic look like the cyberpunk bionic armes featured just a scene ago.



Origins & Technology Behind Sevika's Arm

In Episode 3, Sevika's left arm is severely injured from Powder's IED explosions, which is strikingly similar to that of D'borg's left arm in Bloodborg, which we have already covered.

1 Later, Silco provides Sevika with a Shimmer-enhanced (Blood-Drug) prosthetic,
2 reinforcing her as one of Zaun's strongest fighters. The bionic arm glows purple, indicating that
3 it is infused with Shimmer, the unstable alchemical blood serum developed in Zaun. At this
4 point, the astonishing similarities of blood-based drugs and engineering in both works is
5 abundantly clear.
6

7 The Shimmer injections into Sevika's arm and neck enhance her strength beyond
8 normal human limits, making her a formidable opponent in combat.

9 Unlike traditional Hextech, Sevika's prosthetic is crude, raw, and dangerous,
10 reflecting Zaun's resourceful but hazardous approach to technology.
11

12 Contrast to Viktor's Blood & Hextech Evolution 13

14
15 While Viktor also augments his body in blood based drugs and blood infused
16 magic, his modifications come from scientific desperation to survive his ailments rather than
17 loyalty or violence.
18

19 Sevika's arm is a tool of destruction, whereas Viktor's enhancements are meant
20 for self-preservation and discovery, but end up being tools of destruction, the same as
21 Bloodborg's use of harvesting blood to evolve into Bloodborgs.
22

23 Unlike Piltover's refined Hextech, Zaunite augmentations are more brutal and
24 unregulated, often relying on Shimmer rather than magical gemstones.
25

1 Sevika's bionic arm showcases Zaun's raw ingenuity, highlighting the city's
2 survivalist, cyberpunk-like advancements.

3 Sevika can easily overpower Vi, showcasing her raw strength compared to normal
4 humans. The arm allows her to punch through walls, grab weapons with crushing force, and take
5 on multiple opponents.
6

7 8 **Breakdown of The Episode 5 fight between Vi and Sevika**

9 **S1-** In the episode 5 fight between Vi and Sevika, we see Sevika's left arm
10 charging up with glowing energy, allowing for stronger impact punches.
11

12 **In Arcane**, this is a Shimmer-powered energy system, allowing short bursts of
13 enhanced power, but she needs more injections of shimmer to keep fighting with such speed,
14 strength and ferocity.

15 This is the same as D'borg in Bloodborg.

16 **In Bloodborg.**

17
18 1, "... *injected her in the neck.*"

19 2, "*The guards injected him in the neck daily with a red serum.*"



1 **S2- In Arcane**, Sevika uses her metal left arm to shield her from Vi's attacks.

2 **In Bloodbarg:** *"Noticing her mistake, D'borg flung her bionic left arm up and*
3 *dropped her shoulder forward, protecting her head. She dropped too her knees and leaned into*
4 *the explosion."*



5
6
7
8
9
10 **S3-** When Vi gets the better of Sevika, knocking her to the ground, we see a
11
12 second injection of the Blood-based drug to give her more energy, rage, power and speed.

13
14 **Bloodbarg:**

15 1, *"An Air-Blade flew down and injected her in the neck. The world spun, the boat*
16 *rocked, then release. Flutters and warm energy rushed through her limbs..."*

17
18 2, *"She felt a jab in her shoulder, the impact knocked her off the ledge and back*
19 *onto the roof. She looked up to see an Air-blade scanning her for damage."*



1 S4- Sevika gets up, lifts a barrel with her bionic arm and punches it at Vi. Vi
2 jumps out of the way. The barrel smashes against the wall then rolls around.

3 Strikingly similar to the below scene in Bloodborg.

4 **Bloodborg,**

5 *“D’borg backhanded the bin fire, sending it smashing against a wall then rolling*
6 *around a metal walkway and tumbling off the edge.”*
7



1 S5- Sevika lifts Vi by the throat and slams her to the ground, then Vi lifts up
2 Sevika and slams her against the wall. Then Vi smashes Sevika's head against the wall.

3 **In Bloodborg:**

4
5 1, "D'borg gripped each of the drunken men by their throats, one in each hand
6 she lifted them into the air. Together they wriggled their legs around, desperate for air."

7 2, "She grabbed the two gormless bag sniffers by their collars and yanked her
8 arms backwards, hurtling one man across the walkway and smashing his brains out on the
9 corner of a bricked building. The other fell off the walkway and hung gormlessly snarled in
10 hanging wires."



1 S6- Vi has Sevika pinned down on the ground, Sevika stabs Vi in the right side of
2 her belly.

3 **Bloodborg,**

4 *“As Warwick’s spin finished, he felt a jab to the right side of his abdomen.*
5 *D’borg ended her movement by flinging her samurai straight forward, like a ninja releasing a*
6 *throwing knife; Stealthy silent and swift.*

7 *Warwick stumbled back and forward as he stared into the delighted eyes of*
8 *D’borg. Her laser blue mechanical eye zoomed into the wound to analysis it. Warwick’s midriff*
9 *tingled and stiffened. Warwick looked down to see the samurai protruding from his gut.”*
10
11



1 S7- Sevika tells Vi that Jinx is like Silco's daughter now.

2 **In Bloodborg,** As Warwick has the chance to kill D'borg,

3 "My wife, what about my wife and my boy, you took my Peter. You killed my wife
4 and son and milked their blood."
5

6
7 S8- Sevika is about to kill Vi, Caitlyn shoots Sevika's shimmer injector, ending
8 the fight.

9 **In Bloodborg:** "With her free hand, D'borg gripped Warwick by the throat,
10 squeezing his windpipe and lifting him off the ground. The cartilage of his throat crackled as he
11 choked on his last breath. Biz flew up and stung D'borg in the neck. She released her grip on
12 Warwick's throat, dropping him to the ground."
13

14
15 Both Biz and Caitlyn end the fight by removing the "Cyborg's" blood- chemical
16 advantage.
17



1 **Conclusion & Legal Argument for Exhibit S - Sevika's Bionic Arm & Fight**
2 **Between Vi and Sevika**

3 The striking one-to-one parallels between Sevika's bionic arm and fight
4 sequences in Arcane and D'borg's combat in Bloodborg cannot be dismissed as coincidence or
5 common tropes of the genre. These similarities extend beyond surface-level inspiration and
6 instead demonstrate detailed replication of specific narrative, thematic, and visual elements.
7

8
9 **Key Legal Points of Infringement:**

10 Unique Plot Device and Execution

11
12
13 The bionic arm as an extension of a character's strength and reliance on chemical
14 injections for enhanced combat performance is a key thematic and mechanical element in both
15 works.
16

17 D'borg's left arm injury and enhancement through an injected blood-based serum
18 closely mirrors Sevika's left arm augmentation and reliance on Shimmer (a blood-based drug) in
19 Arcane.

20 The mechanics of power-ups through injections mid-fight are identical, down to
21 the placement of injections in the neck or body, the overcoming of injuries through enhanced
22 physicality, and the temporary nature of the boosts requiring continued chemical enhancement.
23

Highly Specific Fight Sequence Replication

The blow-for-blow similarities in fight choreography between Vi vs. Sevika and D'borg vs. Warwick and others in Bloodborg go beyond general inspiration.

In particular:

Blocking attacks with a bionic arm

Receiving an injury mid-fight and being revived by an injected stimulant

Throwing large matalic drum like objects as a means of counterattack

Choking an opponent, lifting them off the ground, and slamming them down

A last-minute intervention neutralizing the chemical advantage of the enhanced fighter

These highly specific and consecutively occurring events follow the same pattern in both works, making a claim of independent creation statistically improbable.

Pattern of Repeated Similarities Reinforces Copyright Infringement

If this fight sequence were the only similarity between Bloodborg and Arcane, it might be argued as a creative coincidence.

However, this is one of thousands of striking similarities across multiple exhibits, all aligning too closely to Bloodborg's original work to be dismissed as chance.

1 When analyzed collectively, these elements demonstrate a systematic pattern of
2 appropriation, which is consistent with copyright infringement.

3
4
5 **Legal Precedents Supporting Plaintiff's Position**

6 Several copyright infringement cases have ruled that detailed, sequential, and
7 highly specific similarities-especially when coupled with evidence of access-constitute
8 infringement.

9
10 Sid & Marty Krofft Television Productions, Inc. v. McDonald's Corp., 562 F.2d
11 1157 (9th Cir. 1977)

12 Found that a combination of specific, repeating elements across different works
13 led to a finding of copyright infringement.

14
15 Riot Games' replication of Bloodborg's unique cybernetic combat structure,
16 coupled with blood-based injections, aligns with this precedent.

17 Sheldon v. Metro-Goldwyn Pictures Corp., 81 F.2d 49 (2d Cir. 1936)

18 Established that even minor alterations do not absolve infringement if the heart of
19 the material is copied.

1 Riot cannot avoid liability simply by slightly adjusting elements like the type of
2 drug used (Shimmer vs. Blood serum) if the core concept, execution, and structure remain
3 identical.

4 Castle Rock Entm't, Inc. v. Carol Publ'g Grp., 150 F.3d 132 (2d Cir. 1998)

5
6
7 Emphasized that a defendant cannot take protected elements and present them in a
8 “rearranged” format without constituting infringement.

9 The fight sequences, themes, and bionic enhancements align too closely with
10 Bloodborg’s structure to be considered independent.

11
12
13 Fisher v. Dees, 794 F.2d 432 (9th Cir. 1986)

14 Found that copying that is substantially similar in narrative structure and
15 execution constitutes infringement.

16
17
18 Here, the sequence of events in Vi vs. Sevika almost directly mirrors those in
19 Bloodborg, cut up and rearranged, reinforcing substantial similarity.

Final Conclusion:

The presence of a cybernetic, drug-enhanced fighter engaging in a battle where chemical enhancements are used mid-fight, blocked attacks with a bionic arm, and an intervention ending the battle by disrupting the drug supply is far too specific and detailed to be generic.

The Plaintiff asserts that this fight sequence was directly lifted from Bloodborg and that Riot Games has attempted to mask this appropriation under minor aesthetic changes while maintaining identical narrative and functional mechanics. This is not transformative use nor fair use- it is direct appropriation.

Given the repeated pattern of infringement across multiple elements of Bloodborg, the Sevika vs. Vi fight sequence further supports the Plaintiff's claims that Riot Games engaged in systematic copyright infringement, borrowing extensively from Bloodborg to create Arcane.

Declaration

I, Marc Wolstenholme, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Respectfully submitted,

The Plaintiff, Marc Wolstenholme, M.W. Wolf.

Date: March 02, 2025

Signed: *M. WOLSTENHOLME*